

Gomm Valley and Ashwells Consultation Responses

Public consultation exercise 19 September to 30 October 2016.

Respondents	
Parish Council's	<ul style="list-style-type: none"> Chepping Wycombe Parish Council
Organisations and Residents Groups:	<ol style="list-style-type: none"> High Wycombe Society - Andrew Taylor (HWS) – 31st October 2016 Chair of Governors at Tylers Green Middle School - Owen Brangwin (TGMS) – 31st October 2016 Local Authority appointed Governor, Tylers Green Middle School - Jean Stidwell (JS) – 28th October 2016 Penn and Tylers Green Residents Society - Ronald Saunders (P&TGRS) – 22nd November 2016 Pimms Action Group - Tony Garner (PAG) – 30th November 2016 The Chilterns Conservation Board (TCCB) - 31st October 2016 Flackwell Heath Residents Association - Carolyn Leonard (FHRA) – 28th October 2016 Joint Ashwells Liason Group Representative - Kati Bushell (KB) – 30th October 2016 Historic England - Martin Small (HE) – 27th October 2016 Chiltern Society - Michael Chadwick (CS) – 27th October 2016 WDC, Green Space Project Officer - Sarah Townsend (GSPO) – 29th September 2016
Local Residents	75 Local residents responded to the consultation.
Developers/landowners	<ol style="list-style-type: none"> Savills (Representing Taylor Wimpey – TW) 28th October 2016 Savills (Representing WDC – SWDC) 31st October 2016

Number of Representations received	89 Total

Key

- Changes recommended are in red.
- Explanation given as to why changes are not being made.

Content

1. Support
2. Principle (Housing, Employment, housing need, affordable housing, green belt and AONB)
3. Place Making
4. Undeveloped Area
5. Amenity
6. Landscape, Green Infrastructure, trees, ecology etc.
7. Parking
8. Traffic
9. Cock Lane/Link Road/Spine Road/Hammersley Lane
10. Infrastructure (doctors, schools, surgery, police, surrounding roads etc.)
11. Chapter 1
12. Chapter 2
13. Chapter 3
14. Chapter 4
15. Chapter 5 (General Issues)

16. Chapter 5 (Area A)
17. Chapter 5 (Area B)
18. Chapter 5 (Area C)
19. Chapter 5 (Area D)
20. Other Matters (flooding, archaeology...)
21. General

Summary of Representations:

Support	
Comment	Response
1. Well written with excellent plans.	Acknowledged.
2. Welcome the intention to set aside in perpetuity the undeveloped land for a variety of uses and the proposed network of footpaths.	Acknowledged.
3. Welcome improvements on the April 2016 version. <ul style="list-style-type: none"> a. Reformatting of the overall framework b. Massing diagrams and ideas for dealing with sloping topography are an improvement. 	Acknowledged.
4. We support comments by the Ashwells Forum on your current proposals for Ashwells, which were recently exhibited in TG Village Hall.	Acknowledged. Exhibition by development arm of WDC.
5. There are a number of features of the plan that are welcome and it is clear the planners are listening. For example, the setting aside of undeveloped land in perpetuity is most welcome.	Acknowledged.
6. It is clear that considerable work has gone into the preparation of Development Brief. We are broadly in agreement with 'The Brief' so our comments are only to highlight areas we feel are particularly noteworthy or where we feel there are inaccuracies or areas of concern.	Acknowledged.
7. Applaud creation of the DFOs and the attempts to insert / apply them in later parts of the DB.	Acknowledged.
8. Under green infrastructure policies, DFO 11a is part of the creation of an enhanced network of undeveloped green space, comprising chalk, grassland, amenity grassland, hedgerows, trees & woodland characteristic of the valley. This objective	Acknowledged.

<p>is welcomed & does serve to reinforce the point regarding a strong landscape character relationship between the site & the surrounding land, including the AONB.</p>	
<p>9. Pg51; DFO17a – Is a really sensible idea. - DFO17b – We fully support this. - DFO 17c – We agree with this approach so long as full consideration is given to privacy & overlooking issues.</p>	<p>Acknowledged.</p>
<p>10. Pg. 71; we particularly like the idea of drainage being used as a feature in conjunction with the strategic footpath through the site & this providing a recreational amenity.</p>	<p>Acknowledged.</p>
<p>11. Pleased to see inclusion of access from Sandpits Lane rear gardens to access road, allowing us to avoid walking up Hammersley Lane to village amenities. We trust this will incorporate a green corridor wide enough to protect root systems & canopies of ancient hedge oaks along western boundary.</p>	<p>Noted. Arboricultural implications and method statement will be required to ensure existing vegetation of value is retained.</p>
<p>12. Welcome the recognition of Penn & TG Conservation Area in Sect. 3.3.1 & the registered historic parkland of Wycombe Abbey & historic landscape in Sect. 3.5.3 - Although we would like to see a reference to the Conservation Area in the coloured box at the bottom of page 12.</p>	<p>Noted. The points highlighted in the coloured boxes such as that at the bottom of page 12 are intended to apply to the new development on The Site, rather than referring to existing development in other locations.</p>

<p>13. Welcome Sect. 3.8, particularly the recognition of the need for further investigation of the archaeological interest of the southern half of the site to inform any development proposals. However, we think that the nearest listed building is the grade II listed Katherine Knapp Residential Home to the north of the site & would welcome reference to Buckinghamshire Historic Landscape Character Assessment.</p>	<p>The Katherine Knapp home occupies large grounds and is separated from the site by a robust planted boundary; the nature of the development suggested on the Ashwells site is unlikely to have a significant impact on the setting of the listed building however such matters are considered as a matter of course at the planning application stage .</p> <p>The Wycombe District Landscape Character Assessment (2011) has been referenced in the preparation of the brief.</p>
<p>14. Thankful the plan has been sympathetic to how this new development would settle into the valley & plenty of views & green spaces remain, as will the ancient woodlands.</p>	<p>Noted</p>

Principle (Housing, Employment, housing need, affordable housing, green belt, AONB etc.)	
<u>Comment</u>	<u>Response</u>
<p>15. Dramatic increase in development from that consulted on in 2014.</p> <ol style="list-style-type: none"> 1) Parcels 7 & 8, which reduces the separation between communities. 2) Parcel 9 added without justification. 3) Parcel 11 added despite being shown to be in a more visible area and will overlook and appear overbearing on Ashwell's dwellings. 	<p>The Council is committed to reviewing the site afresh. The 2014 options consultation document was not the starting point for consideration of the site. The inclusion of parcels 7, 8, 9 and 11 has followed a detailed assessment of the constraints and opportunities on the site and is considered to represent an appropriate on balance position.</p> <p>Parcel 11 is in a visible location. This part of the Ashwells site is visible form Totteridge/Micklefield and in much longer distance views. All public views of the west side of Ashwells are set against a foreground of urban development. Urban to urban views are not considered to be as sensitive as rural to urban views. The key importance of the western side of Ashwells is the views out rather than the views in. It was considered that the benefit arising from creating an additional access into Ashwells outweighed the landscape impact.</p>

<p>16. Requests flexibility within the Development Brief to support either employment or residential uses (or a mixture of the two) on parcel 12.</p>	<p>Residential use was considered within this parcel, but the access arrangements were not considered to be appropriate. A meeting was held with Mr Agg (representing TW) who did not dispute this and supported commercial use of the site. In all events the Council requires both commercial and residential land within the district as a whole. The Council would not be prepared to support a small pocket of hidden and isolated residential development. Access through the business park to a pocket of residential development would also be poor.</p>
<p>17. Disputes the size of parcel 12 being 0.92ha. In their view the developable area is 1.2 hectares. Both figures are also at odds with the 1.1ha figure in the draft Local Plan. These documents should all be consistent.</p>	<p>The developable area is illustrative and needs to be tested. Just because an area is identified for further testing it should not be assumed that it could or should all be built on. For consistency a 1.2ha figure will be adopted across all documents (search doc. For 0.92 figure). Done</p>
<p>18. I would like to know what measures are in place to indicate what further development and population growth are possible without radically changing the character of the region? Is the answer to Central Government always 'yes we can take more people'. Or is there ever a point at which WDC says 'no we are full up'.</p>	<p>Central Government policy changes over time. This is a matter that extends far beyond the scope of the development brief and this consultation exercise.</p>
<p>19. Brownfield land to take priority over countryside (farming, rural habitat, views and congestion).</p>	<p>Wycombe District has an acute need for housing and in particular affordable housing. The loss of agricultural land and countryside is a negative aspect of the proposal, but outweighed in this case by other considerations.</p> <p>The Council has been focusing on Brownfield development for many years, but the supply of brownfield land can no longer keep pace with the demand for housing land and the Council's commitment to supply it. Therefore, reluctantly the Council has had to start releasing greenfield land to ensure a rolling 5 year supply of housing land. The Council will continue to work proactively with developers to release brownfield sites as they come forward to limit the need for green field sites. Brown field land has and continues to be Wycombe Districts primary supply of land for housing.</p>

	For the sake of clarity Gomm Valley is not green belt or Chilterns AONB land.
20. No. of dwellings proposed is excessive for the site & its location.	The broad quantum of development envisaged by the Brief follows a detailed assessment of the constraints and opportunities on the site. Further analysis on the impact of development will be produced as the site is progressed, which may impact on the quantum of development proposed.
<p>21. More detail needs added to this section (pg 67-71) to allow the brief to state the following:</p> <ol style="list-style-type: none"> 1. Any properties at the edge of the site (the outer boundary) should be detached in style in order that they blend in with existing houses. The brief should detail the need for house styles to be staggered from new homes similar in size & footprint to existing properties & phased into semi-detached or terrace style cottages as you move further into the development. May be inappropriate to move straight from an existing detached house into terraces cottages. The final design should be sympathetic in blending styles from existing to new or providing a feel of moving from old to new without a clash of styles. 2. Development must provide landscaped screening/buffering to maintain the privacy & soften the impact of the new development on existing residents. 	<p>Amend Brief to acknowledge the need for a looser form of development at the edge of the parcels where they abut open countryside. This will not be necessary on those parcels that are tightly enclosed by existing vegetation.</p> <p>It is considered to be too prescriptive at this stage to indicate the precise location of detached, semi-detached or terraced properties.</p> <p>Landscaping will be sought as part of any high quality scheme to soften the built environment and provide an attractive and healthy living environment. This vegetation will also inevitably screen views.</p>

<p>22. Re-locating of Parcels 7 & 8 to ensure separation between communities is not as low as 200m but nearer the original proposals of over 500m.</p>	<p>Maintaining separation between Tylers Green and High Wycombe is an important consideration in character terms. The proposed gap has been the subject of considerable discussion. It is the considered opinion of officers that the proposed gap is the maximum that can justified having regard to character, green infrastructure corridors and landscape impact. However, it is considered that the quality of the gap and perception of separation could be improved by extending Gomms Wood to the eastern side of Cock Lane.</p>
<p>23. Pg. 49 - we support an undeveloped gap between TG & HW.</p>	<p>Acknowledged.</p>
<p>24. Pg. 68 – Dwelling typologies & parking; we particularly agree with the comments regarding the scale & roof lines of the new development to avoid them having an overbearing impact on existing development & providing straight lines of ridges on the skyline. When choosing trees, autumn colours should be considered. Generally the Character Areas make it very clear how the site will be developed and these appear to have been given a great deal of consideration which will hopefully result in an attractive built environment.</p>	<p>Acknowledged.</p> <p>Having a good range of tree planting should deliver Autumn colour.</p>
<p>25. Housing stock should only be made available to owner-occupiers or housing associations, not private landlords. Housing targets were created to ease demand for affordable housing, not to be a cash cow for speculators.</p>	<p>We live in a liberal free market economy. Planners cannot control private ownership. Affordable housing will be provided through planning, but thereafter regulated by housing law.</p>
<p>26. The argument of building more affordable housing is a fallacy - the area is an expensive place to live & its nonsense to suggest new housing will be affordable.</p>	<p>Affordable housing is a tenure type (i.e. a form of housing that is sold onto registered social landlords) and is not to be read literally as cheap housing. However, housing falling within the affordable housing category will be relatively cheaper than market housing.</p>

<p>27. In 2007 the Council argued that GV should be designated as green belt and AONB. How is the current position compatible with this?</p>	<p>The Council lost the argument that the site should be designated as green belt. The Inspector at the Core Strategy public inquiry designated the site as a reserve site for future development. Therefore the current position is entirely compatible with the outcome of the Inquiry into the Core Strategy.</p>
<p>28. TG & Penn has its own village identity which could be destroyed with further development in the local area. Instead of building on green field & agricultural land; develop more brown field sites in Wycombe town. There are significant opportunities with the decline of between 10% – 20% demand for retail space due to the change in shopping habits. Over the foreseeable future Frogmoor could be re-developed e.g. The Chiltern Centre and surrounding area. There are many empty units or temporary “pop up” shops in this vicinity. In and around Desborough Road area also has opportunities for residential developments.</p> <p>Develop residential space above shops – this is done to great effect on the continent. Develop redundant office space into residential flats/apartments as currently undertaken with Westfields House on the A40. These recommendations also mean that existing gas/electric and sewerage are also in place as are, in most cases, existing road networks, and of course this would stimulate the towns’ economy without a significant increase of traffic congestion.</p>	<p>The Council always has, is currently and will continue to focus development in existing urban areas. However, we are not able to deliver all of our development needs within the existing urban area and therefore some greenfield development is required. Under the emerging New Local Plan the majority of new development will occur in existing urban areas.</p>
<p>29. Additional housing is not required. WDC needs to push back on central government. Brexit will reduce population pressure.</p>	<p>This is not borne out by the Council’s own studies or market signals such as rapidly rising house prices.</p>

30. Answer to alleged housing crisis is new towns, garden cities, not constant bolt-ons to existing towns & villages.	In order to ensure delivery the answer to the housing crisis is likely to be all these things. There is no one solution.
---	--

Place Making / Design (Comment on proposed character of plots)	
<u>Comment</u>	<u>Response</u>
31. Mechanism for achieving good quality design: 1) Design codes 2) Design review 3) Architect Competitions	It is not intended to go in to this level of detail at this stage. A design code can be delivered via condition. The manner of procuring housing design (such as architects competitions) is a matter for the landowner/developer rather than planning.
32. Density is a blunt tool. Need to focus on space typologies, spacing, roof form, grouping and rhythm.	Need to strike a balance between being prescriptive and providing flexibility moving forwards. Roof form is already indicated on illustrative plans (diagrams with flat roofs features for some of the areas where topo is more challenging) also spacing/rhythm of buildings is implicit in a number of diagrams 5.9, 5.13-5.15). Retain density. Whilst it is a blunt tool, it is useful at focusing prospective developers minds.
33. Site requires community facilities of some kind (shop/community hub etc).	It is agreed that the site is in need of a community focus so as to avoid the creation of a suburb of High Wycombe with no identity of its own. However, it is not considered that a local shop or local work units in this location would represent a viable proposition. The school could provide a community hub, but it's out of hours use cannot be guaranteed and therefore its community function will be limited. It is understood that the Chiltern Rangers are currently seeking a new premises for the Trust, which is a community based woodland rangers organisation that provides practical habitat management in Bucks and the wider Chilterns. They manage a number of nature reserves in the area, including woodlands, chalk grasslands, commons, ponds and chalk streams.

	<p>They have strong links to a number of community organisations, charities, social enterprise groups, schools, colleges etc.</p> <p>They are seeking a new building that provides office space, a classroom, works vehicle storage and potentially a social enterprise coffee shop teaching cooking skills. The Chiltern Rangers are well known to the Council and are considered to be a responsible organisation. It is considered that there is some potential to provide a community facility operated by the Chiltern Rangers to the north of the school site. This area would be unsuitable for housing due to the relationship with the SSSI, but for an organisation already involved in the management and maintenance of the GV SSSI, the relationship is considered to be acceptable. Therefore, for ecological and place making reasons it is considered to be appropriate to allocate the area to the north of parcel 3 for use by a not for profit environment centre type use (whether for Chiltern Rangers or a similar such organisation), which has the potential to link to the wider management of the site.</p> <p>Indicate potential for environment centre type building. Need an area of circa 2000sqm. It is not envisaged that this would be provided by the developer.</p> <p>Add para. to 5.3 setting out vision for environment centre (use text above). Include an image similar to that on page 57 in the bottom left corner (community building, green roof etc).</p> <p>In terms of delivery the land should be provided at nil cost to WDC for potential use as a community/environment centre type use with a functional connection to the undeveloped land.</p>
<p>34. The Development Brief needs a vision statement identifying particular qualities to be safeguarded and nurtured.</p>	<p>Agreed. Vision to be added after Foreword.</p> <p>Gomm Valley and Ashwells Development Brief site will deliver a high quality mixed use development comprising housing, employment and community uses. The site framework will be landscape led recognising the intrinsic character and beauty of the hillside landform, whilst accommodating opportunities for development. The site will need to connect to adjoining urban areas offering travel choice to existing and future</p>

	<p>residents. The site will embrace opportunities to travel by car, bus, bike and on foot. The site will have a diverse community and deliver a mix of housing type, size and tenure to cater for this community. The architectural response will need to be bold responding to the challenging topography on the site and will require a bespoke architectural response. The site will deliver opportunities for exceptional architecture in key locations that benefit from dramatic views. The site will include large swathes of undeveloped land. The undeveloped land will retain the most important landscape assets in the valley and provide a green lung through the site linking key ecological assets. At the heart of the community will be the preservation and enhancement of ecological value on the site with an environmental hub at its core.</p>
<p>35. Need to reference to sources available from recognised national authorities:</p> <ul style="list-style-type: none"> 4) Urban Design Compendium (inclusion in para. 5.4). 5) CABE 6) Countryside Commission. 7) CPRE; and, 8) others 	<p>These and many other documents set out planning and design best practice and as a result are often referenced when designing a site. They are not however specific to this site. For the brief to be easy to use we have endeavoured to focus on site-specific guidance and not to repeat guidance which is already found in other recognised documents with clear provenance. Whilst it would be sensible to add a statement indicating that other best practice reference documents will be used to inform the development of the site going forward, listing them individually would be counterproductive as it would inevitably lead to further discussions about why some were included and others not, and resulting arguments about their relevance to this site.</p>
<p>36. Confusion over type of housing to go in Parcel 10 & later 11, Council official said they would be like the Wheelers estate & no low-cost housing, then pictures on the display at the Council Offices show some examples totally out of keeping. What style is proposed?</p>	<p>The precise style of housing will not be known until the Reserved Matters stage. The Brief gives an indication of the type of housing that may be appropriate. The Council would not want to be too prescriptive at this stage. Modern or traditional forms of development could all be appropriate on the site. This level of detail will not be covered by the Brief.</p>
<p>37. Style & layout of buildings (DFO 17). Extremely sensitive & subjective area. Some examples shown in the brief would not sit easily on the site particularly at the TG end. If this development goes ahead I hope we can see & will be able to comment on these when the Developers have</p>	<p>Consultation on detailed designs, either through the Liaison Groups and/or statutory consultation, will be undertaken in due course.</p>

<p>had a chance to come up with their own designs.</p>	
<p>38. Style of Housing - It was mentioned to us in previous liaison meetings there was an acknowledgement of the need to build detached houses around the edge of the field, to blend in with current housing. Very supportive of this. Concerned that a totally different style of house will be built immediately next to where we live, which would drastically change the feel of neighbourhood. Inappropriate to have terraced housing next to existing detached properties for example. Request you allow the character of the new development to blend in with its surroundings at the entrance & as you move into the site. There is an existing footpath so would make sense to create a landscaped area to provide a gap & feature between Ashwells & the new housing. Planting of trees & other landscaping would help to blend the two styles of housing.</p> <p>Too many houses will have a high roofline & feature a 'bonus room' in loft area, especially in the areas closest to existing houses. Hope that the number of these houses with this feature is managed to a low percentage of houses built.</p>	<p>The Brief does not seek to go into this level of detail. However, lower density development at the edges of development parcels where they abut open countryside is likely to facilitate an appropriate transition.</p> <p>Footpaths through the site may be diverted (i.e. realigned to work with the development).</p> <p>The brief makes reference to the need to consider massing and roof forms to keep buildings as low as possible</p> <p>Need broad guide in Brief to manage relationships between existing and proposed development.</p>

<p>Undeveloped Area</p>	
<p><u>Comment</u></p>	<p><u>Response</u></p>

<p>39. Welcome intention to set aside undeveloped land in perpetuity with a network of public FPs & cycleways through valley.</p>	<p>Acknowledged.</p>
<p>40. Undeveloped Area needs fully articulated strategy.</p>	<p>A lot of this information has already been provided and is contained at para. 5.3. Advise para. 5.3 is relabelled 'Strategy for Undeveloped Area' and ecology/green infrastructure become sub headings.</p> <p>Insert text along the following lines:</p> <p><u>Strategy</u></p> <p>Incorporate Fig 5.10.4 into Para. 5.3 (i.e. one chapter dealing with the undeveloped area).</p> <p>Need to add:</p> <ul style="list-style-type: none"> • The principal focus for this area will be ecology followed by recreation and then farming. Recreation and farming will only be appropriate when they do not undermine the principle aim of ecology. • In chalk grassland areas public access will be restricted, particularly if grazing occurs. • Gravel surfaces and unmade paths will be used. The finish will be dependent on the expected frequency of use and location. Any path to be used by cycles will need a bonded or compacted gravel surface.
<p>41. Need a delivery mechanism for the undeveloped area.</p>	<p>Agreed.</p> <p><u>Delivery</u></p> <p>Any planning application on the site must provide a comprehensive strategy for all developed and undeveloped areas, which must include a phased delivery plan and full management costs for a minimum of 25 years. The undeveloped land must be put into Trust for the foreseeable future with the primary objective of promoting the ecological value of the land.</p>

<p>42. Would like to see footpaths in undeveloped area retain a rural feel rather than be given a tarmac surface.</p>	<p>Amend brief to reflect this requirement. Footpaths within undeveloped area to comprise a mixture of unmade, compacted gravel and bonded gravel to reflect the intended nature and frequency of use. Cycle paths will need to be bonded to facilitate grip and minimise wheel spray.</p>
<p>43. Enhancement of securing undeveloped land in perpetuity to include the land alongside Cock Lane by using all possible measures such as covenants, signing the land over to Penn & TG Residents Society, the Woodland Trust or another suitable body and designating the land as strongly as possible e.g. as village green.</p>	<p>Amend Brief to reflect aspiration for the undeveloped area.</p> <p>Land would preferably be owned by a responsible ecology focused organisation.</p> <p>Land must be put into Trust.</p> <p>In the longer term options should be reviewed to designate the Land as Common Land, Green Space and/or Greenbelt. The Council may also make requests for changes to national designations such as the Chilterns AONB and/or extensions to the SSSI.</p>
<p>44. Pg. 75 Sect. 5.10.4 - Copse of trees at North end of Ashwells site ought to be included in the undeveloped area due to significant wildlife link & has visitations from deers (muntjac & roe), badgers, foxes, slow worms, hedgehogs & many birds.</p>	<p>Dependent on final layout and views of the trust that adopts the undeveloped area.</p>
<p>45. Sect. 5.3 Beneficial to retain undeveloped areas as agricultural land. Would benefit new school pupils who could see farming processes for themselves.</p>	<p>Some farming that is consistent with the ecological use may still occur on the site (i.e. grazing of chalk grassland).</p>

Amenity of Residents (overlooking, loss of light etc.)

Comment	Response
46. Houses should be designed to accommodate home working.	Houses are expected to come with a range of bedroom sizes, which will be capable of accommodating home working. Fibre Optic broadband is now standard. Officers work with all developers to ensure fibre optic lines from the exchange to home.
47. Local residents see no need to relocate RoW CWY/14/1 as runs above sewer zone + gives extra separation from backs of new houses. No security issues, they say.	<p>Public footpaths flanked by high level fencing on either side make poor public routes. Where possible they should be designed into a scheme to provide a high quality walking environment and good natural surveillance (i.e. overlooked to reduce the risk/fear of crime and anti-social behaviour). By diverting the footpath the quality of the walking environment can be improved.</p> <p>The primary purpose of footpaths is to provide a good quality walking environment. Not to provide separation between developments. An acceptable relationship between the dwellings in Ashwells and any new development can be achieved without creating a poor quality walking environment. The Brief will be amended to provide clarity on how the relationship between Parcel 11 and Ashwells can be acceptably maintained.</p>
48. Plot 11 - This is a steep field. Any houses built here would impact the privacy of houses at the top of Ashwells & Greenridge as they would be higher & look directly into these properties. Little screening in place to avoid this so the development must provide new screening/trees to keep the privacy of those residents.	<p>Brief has been amended to reflect the bespoke design requirements to manage the relationship between Parcel 11 and the properties in Ashwells.</p> <p>Add the following to para.5.4.5</p> <p><i>"The relationship between parcel 11 and the existing properties in Ashwells and Greenridge is particularly sensitive as the existing properties in this location are sited on lower ground than the Development Brief site, which makes them particularly sensitive to issues of overlooking and the overbearing impact of new development. To appropriately manage this relationship back to back window distances should achieve a minimum of 35 metres and gardens should be of sufficient size to facilitate the establishment of structural planting to soften the impact of new development on these dwellings and their most usable external amenity space. Where no windows are present a minimum distance of 20 metres from the rear of the properties in Ashwells/Greenridge to first floor level of any new development should be observed to prevent any unacceptable overbearing</i></p>

	<i>impact. In the event that the gardens of these properties are extended structural planting could be incorporated within this space thereby giving existing occupiers control over the future screening effect of the vegetation.”</i>
49. Lighting - Ashwells has always been a ‘street light free’ road & am strongly in favour of it remaining so. I have no wish to have my home illuminated by street lighting after dark.	<p>Clear statement added to Brief to reflect requirement for no street lighting.</p> <p>Add to para 5.4.5 – “TG is an area with no street lighting. The purpose of this is to respect the areas more rural character and on sustainability grounds. Any development in parcels 9, 10 and 11 should respect this characteristic and should not incorporate street lighting.”</p>
50. Despite a number of invitations, no-one at or representing WDC has seen the impact of the proposals from our perspective by visiting our property to see the potential privacy, light & general visual amenity impact. Would have thought it beneficial for your analysis to be undertaken with all available insight at your disposal? Whilst we still oppose any development on Parcel 11 the revised plans are going to have more chance of landing agreeably if we feel you can truly empathise with our predicament & through solution-focussed dialogue as they evolve.	Such site visits to view sites from the gardens and houses of key adjacent properties are a normal part of the process when determining a planning application and will typically be undertaken at that time rather than during the drafting of a site brief. At this time there is no firm proposal to assess.
51. Only a rough description of how tall the proposed houses will be; if you allow 2.5 or 3 storey homes they will tower over garden. Why can't you do a drawing, artists impression of what view residents of Pimms Grove/Close will have from their bedroom windows as at the moment its guesswork.	The Development Brief is establishing the principles of development and not precise details of scale or external appearance. This information will be shared as soon as it is available and guidance has been included in the brief to require details sections to accompany any planning application on the site.

Landscape, Green Infrastructure, trees, Ecology etc.

<u>Comment</u>	<u>Response</u>
<p>52. little alternative to driving in the Chilterns, unless you live near a bus route. Cycling is mentioned in several places in consultation. Cycling is hard in Chilterns due to hills. Council makes noises about how it is improving the options for cycling & sustainable transport, but this only seems to maintaining recreational walking & cycle routes rather than making the roads suitable for commuter cycling.</p>	<p>Cycling and walking is an important part of the Council's sustainable transport strategy.</p> <p>The Development Brief includes provision for walking/cycling routes North/South and East/West. The North/South route would link to the London Road routes, both on and off road providing viable commuting routes for cyclists.</p>
<p>53. Red kites & bats nesting & breeding in area & small mammals (rabbits & badgers). Parcel 11 is an attractive open space benefiting the area & its residents.</p>	<p>The site is currently predominantly farmed for arable purposes. Arable land, whilst valuable, is generally of relatively poor ecological value. It is envisaged that the proposal will deliver ecological improvements by repairing hedgerows, adding extensive areas of planting and providing a continuous green corridor from North to South. The provision of additional chalk grassland also comprises an important habitat. The location of badger sets are known and are not proposed to be impacted by development. There will be ongoing assessment of the impact on ecology as the site progresses through the planning system. The Brief has been amended to provide a clear vision for the undeveloped area and its focus on ecology.</p> <p>Parcel 11 was introduced in order to provide a new access to the Ashwells site other than solely through the existing Ashwells development.</p>
<p>54. Supports the landscape-led approach. Site sensitivities require landscape assessment based on site topography & any wider impacts, measured against the baseline of the Bucks Landscape Character Assessment & assessment of visual impact, as is consistent with the Guidelines for Landscape & Visual Impact Assessment (2015). All parts of Policy DFO 5(a) must be delivered &</p>	<p>The Development Brief must be read as a whole. The brief has been developed with reference to the Bucks Landscape Character Assessment, and Landscape and Visual Impact Assessment work will be required to be done in accordance within the relevant guidelines where appropriate.</p> <p>For the sake of clarity Gomm Valley is not within the Chilterns AONB nor is it directly adjacent to it, or readily seen from it.</p>

<p>mitigation cannot be used to justify development contrary to DFO 5(b) and DFO 5(c). This reserve site needs to be carefully assessed to ensure that it conserves & enhances the natural beauty & landscape character of the AONB. Undeveloped slopes & valley bottoms, together with woodland planting, fit with the landscape character of the wider Chilterns, which includes LCA 22.1 Beaconsfield Mixed Use Terrace, in neighbouring South Bucks District.</p>	<p>There may be the need for some deviation from the landscape objectives, particularly with regard to the manipulation of the landscape. The spine road for example is likely to require some manipulation of the landscape.</p>
<p>55. SK – Pg. 27 Sect. 3.6.1 - LWS should be re-inspected to ascertain if it is still supportive of particularly important species. If not it could help provide valuable access to parcel 1.</p>	<p>LWS will be assessed, the aim will be to improve the ecological value of the site including the LWS.</p> <p>The Development Brief has been amended to include an access from Gomm Road to Hammersley Lane. Whether this is open to all forms of transport or just bus, walk and cycle will be assessed as part of the Transport Assessment.</p>
<p>56. Pg. 27 Sect. 3.6.4 - Anyone living here is aware there is no shortage of Red Kites. Two species of deer are also resident but not listed.</p>	<p>This section lists species which are classified of nature conservation importance and is not intended to be a comprehensive list of all fauna found on the site.</p>
<p>57. Pg. 27 Sect. 3.6.5 – Consideration should be given to include a greenway around Ashwells site when detailed layouts are considered.</p>	<p>The brief indicates both the protection and enhancement of existing hedgerows such as those surrounding the Ashwells end of The Site, and creation of new ones.</p>
<p>58. Pg. 44 Sect. 5.2 – More weight has been given to the development's appearance from the South rather than potential impact on properties surrounding it.</p>	<p>This is appropriate as views from private properties do not carry as much weight in the planning process as public views from important vantage points.</p>
<p>59. Pg. 48 Sect. 5.3.2 - The stated requirement that "existing hedgerows & trees should be retained & a minimum 5m buffer should be provided between</p>	<p>It does in fact apply to this copse.</p>

<p>them & any development” should also apply to the copse to the north of Ashwells site.</p>	
<p>60. Welcome the strengthening & refinement of ecological measures in other parts of Brief compared with earlier drafts & have no other significant issues with the rest of the content (given the context of the principle of development at all having to be conceded).</p>	<p>Noted.</p>
<p>61. Sect. 3.12 Essential to retain hedgerows in their current form, especially those running north-east up the valley from the rear of Business Park & running east to the bottom of the SSSI which contains ancient banks & is home to badgers.</p>	<p>The brief does indicate that hedgerows should be retained. There is considerable scope to improve many of the hedgerows on the site, which have been poorly maintained in many cases for a number of years.</p>
<p>62. Sect. 5.1.1 Linking Hammersley Lane through to Gomm Rd is unnecessary & cause disturbance to chalk bank LWS. This area inhabited by, among other fauna, slow worms, identified by BBOWT (and mentioned in section 3.6). Also against DFO9 (4.3).</p>	<p>DFO indicates that where a degree of severance is unavoidable minimise harm and mitigate. In this instance a link between the two developed areas is considered to be unavoidable for the purposes of walk, cycle and bus routes. It has yet to be established whether there are any benefits with regard to private cars.</p>
<p>63. No widening of the carriageway should occur in Gomm's Wood to the west of Cock Lane. It's designated Local Nature Reserve & Local Wildlife Site. This area has recently (since 2012-13) been recolonised by Silver-washed fritillary butterfly & is well used by bats, birds including Bullfinch & other species. The loss of any land in this area in addition to the development area is unsuitable & unacceptable. Better to replant a mixed native hedgerow inside the line of the existing one along Cock Lane, Ashwells side which should as part of a</p>	<p>Guidance contained within the brief limits the widening of Cock Lane along this sensitive boundary however the detail of that widening that is required will be considered at the application stage, and appropriate mitigate sought as required in line with the brief. The anticipation, in landownership and levels terms if nothing else is that any widening that is required will take place on the eastern side of Cock Lane.</p>

<p>S106 be managed to ensure it thrives & eventually laid in traditional style when it has grown to an appropriate size (approx.. 10-12 years). Thereafter maintained by suitable management eg cutting back every 2-3 years as necessary.</p>	
<p>64. Footpath parallel with Carter Walk should run adjacent to the copse rather than through it.</p>	<p>The precise location of any footpath and function of the copse will be determined by the layout of the scheme on the site. In all events the copse will need to serve a public purpose. It would be inappropriate to simply fence off an area of this nature. This would make it susceptible to dumping of garden waste and encroachment by residential gardens and it will not have a clear ownership or function.</p>
<p>65. Potentially more significant longer term would be a diminution of habitat quality in small parcel of LWS land remaining to south side of link road due to impracticalities of grazing (the preferred management technique) such a small area. If the link road were to go ahead, its impacts would be reduced by: aligning it as far to the south as possible (thus reducing the area of LWS split off from the rest); restricting it to a bus-only route (which appears to be the main claimed justification for the road).</p>	<p>The alignment of the road is principally dictated by the topography. However, the management implications are noted. It is possible that the small severed part of the LWS would be put to an ecological purpose other than grazing. The site as a whole is expected to deliver significant ecology and chalk grassland gains.</p>

<p>Parking</p>	
<p><u>Comment</u></p>	<p><u>Response</u></p>
<p>66. No indication of how construction traffic will get to Ashwells.</p>	<p>This is a detailed matter that will not be addressed by the Brief but is instead dealt with by a construction management plan normally submitted in association with a planning application. It is most likely that the site will be accessed via the new access to minimise the impact on existing residents.</p>

<p>67. Need reassurance that on-street parking will not become an issue in Ashwells.</p>	<p>Provision will be made for some on-street parking within the new development area. Parking will be expected to be delivered in accordance with the County Parking standards, which requires on and off-street parking.</p>
<p>68. Concern for traffic access via Gomm Road, adjacent to Peregrine Business Park. Parking capacity at Peregrine is insufficient & 'overspill' staff currently park roadside on both sides of Gomm Road near the railway arch, extending down Bank Terrace which is already congested with resident parking.</p>	<p>The northern part of Gomm Road will need to be remodelled. Some existing on-street parking will likely need to be restricted. Additional parking will need to be created on the spine road. The Brief (Para. 5.4.2) will be amended to state that any parking on Gomm Road which is lost as a consequence of developing the site will be re provided either on or off the site in a safe and convenient manner. This is in addition to the parking needs of the development.</p>
<p>69. Ashwells is effectively a Cul-de-Sac which is used for car parking for the Middle School, this will not be possible if it is a two-way road for access to three of the parcels of land, therefore additional parking would need to be provided at the Middle School, which is unlikely given that the only space is the playing fields which will have to accommodate additional pupils. A suggestion of the liaison committee is that Ashwells should remain a Cul-de-Sac, with a proportion parcel 10 accessible via Ashwells, or at a minimum revert Ashwells to single direction access to the development parcels.</p>	<p>Not linking the new development through to Ashwells would be contrary to the proper planning of the site, and is not necessary to address this issue. There is an existing parking issue associated with the school. The development site has the potential to further impact on Cock Lane. This is a reserve site for future development (not just residential development) and can quite properly be expected to contribute the resolution of an existing issue in the area. Therefore, the brief should make provision for school pick up/drop off provision. The pick-up/drop-off provision can be provided onsite or offsite. Para. 5.4.5 of the Development Brief has been amended to reflect this.</p>
<p>70. Will there be adequate parking for new residents or will we have more cars parking on existing roads? Particularly around the Middle School, parking on the road is already substantial.</p>	<p>The Council uses the most recently adopted County Parking Standards, which are based on the 2011 census data. Given the relative accessibility of the site, the level of parking could be equal to or exceed the new County Standard, but should not be below. The Brief will be amended to reflect this.</p> <p>The potential for new residents to park in existing roads and/or existing residents to park in the new roads cannot be ruled out. The provision of adequate parking and peoples inclination to parking as close to their houses as possible should</p>

	ensure significant levels of displaced parking into existing residential areas does not occur.
71. Its intended that most parking will be in unallocated spaces and/or on the road. Given that most households own at least 2 cars this is most certain to lead to congestion on the proposed access roads.	The brief recommends that in some locations at least 50% of the parking be unallocated, on street. This would still leave scope for 50% of the parking to be allocated. Roads should be designed to accommodate parking safely.
72. Modern developments do not cater for modern living, we all have cars, stating things like 50% will be allocated parking & 20% will have to be on street, means 30% is not accounted for. Combine that with multiple cars per residence that are not planned for & the whole thing will be grid locked, instantly cause angst amongst owners. Please can WDC account for all cars expected in the development with off street parking.	Add 'of the total parking spaces' p 68 to make meaning more clear. The wording indicates that where <i>over</i> 50% of the [total] parking is allocated, then an additional 20 must be provided and must remain unallocated'

Traffic	
<u>Comment</u>	<u>Response</u>
73. Agree that it is important that there are multiple ingress and egress points to the main A40, otherwise it is likely that traffic congestion could produce a gridlock situation at peak times. We also agree the link road should be high up Cock Lane so that only the far north section of it will need widening.	Acknowledged.
74. Concerned about additional traffic on New Road. Already suffer from noise levels as a result of additional traffic. Road is becoming increasingly	Modelling and transport analysis is underway. It will be necessary for any significant highway safety/convenience/capacity issues to be resolved. Speed management can be delivered as deemed necessary and reasonable.

<p>dangerous & nothing is in place to manage the speeds. Adding more residential properties to neighbourhood will add to these issues.</p>	
<p>75. Ashwell's site, thought of 500+ more cars trying to get onto the A40 fills one with despair. Proposed housing density is in line with a city, not a village.</p>	<p>With the exception of Parcel 1 the densities on the site are relatively low at circa 25-35dgh. This reflects the relative accessibility of the site and topography. The Council is pursuing a package of measures to improve flow on the London Road to which the development will be expected to contribute.</p>
<p>76. If additional shopping facilities are being created at the bottom of the Gomm Valley entrance (around B&Q & Business Park area) this would result in even more traffic.</p>	<p>Aldi have submitted an application. This application has yet to be determined. Any traffic impact will need to be taken into account in respect of the Aldi application and any development at Gomm Valley.</p>
<p>77. The greater housing density & added parcels add to the likely overload on transportation routes. This should be reduced.</p>	<p>The quantum of development in terms of dwelling numbers has remained broadly similar since 2014. Whilst the developable area has increased this has been linked to falling density.</p>
<p>78. Cock lane is unsuitable for trucks during the development.</p>	<p>This is acknowledged. This will need to be addressed as part of a construction traffic management plan, which is best secured at the Outline application stage.</p>
<p>79. With the possible addition of a 1200 school on the site of a closed school in Penn village & one road serving a development of approx 600 homes plus primary school on site itself with the general flow going onto already busy A40, development should be limited on this scenic site. Hammersley lane is gridlocked on any school morning at 8.30am from the A40 until half way up the hill. Cock Lane is single track road so is not considered by many.</p> <p>Major outcome long term is for the Council being forced into Junction 3A as traffic which is already bad will be much worse. Coupling this with over</p>	<p>The ongoing infrastructure challenges in the High Wycombe area are acknowledged, but go beyond the scope of this Brief to address. This is a matter for the New Local Plan and beyond.</p>

<p>5,200 new homes around HW itself there is no other outcome.</p>	
<p>80. Already significant issues with traffic using Hammersley Lane & Church Road as cut through to Hazlemere or Amersham. No street lighting & cars that use the 'cut through' have no regard for local residents or potential children crossing the road. Hammersley Lane is heavily congested at peak times without the added problem of vehicular access to Parcel 1.</p>	<p>Parcel 1 is dependent on an access being created directly onto Hammersley Lane. A long winding residential cul-de-sac accessed off of Gomm Road is not an acceptable urban design or planning outcome.</p> <p>Any access onto Hammersley Lane will need to be tested with modelling and proven to work. It is acknowledged that there is likely to be congestion at peak times, but this is true of most of the town at peak times. Junction capacity will be tested as part of the application.</p>
<p>81. Inclusion of access point from parcel 1 onto Hammersley lane, provides a rat run to avoid the A40 all the way to Rayners Avenue.... is this intentional?</p>	<p>Road networks should link up in multiple ways. This is what makes them robust. The Council does not wish to encourage rat running. The aim is to make the main arterial routes work as well as possible to minimise the use of secondary routes. A degree of spreading of the impact on the network could assist the functioning of the London Road.</p>
<p>82. Pleased that proposed traffic light controls & pedestrian walkway under bridge are no longer in the plan.</p>	<p>Removed from plan due to potential negative impact of vehicles backing up onto London Road.</p>
<p>83. Continued disappointment that WDC & BCC have not made any realistic effort at offering a solution to the traffic problem. Traffic situation is dreadful & any further development in the District will aggravate the situation. No sign of workable solution & traffic situation will be sorely tested by the current developments let alone any additional developments.</p>	<p>Infrastructure issues are addressed by Reserve Sites Infrastructure Delivery Plan and New Local Plan Infrastructure Delivery Plan. It is acknowledged that there are significant legal, financial and physical constraints to upgrading infrastructure.</p>
<p>84. Your traffic footprint will always be incorrect as you calculate that if, say, 60 houses are built, then that is 60 more vehicles on the roads. Sixty is bad enough, given the current congestion on Wycombe</p>	<p>Vehicle calculations are based on TRICS data analysis and applied using industry standard methodology:</p> <p>http://www.trics.org/trip_rate_calc.aspx</p>

roads, which Council studiously ignore, the calculation should be two vehicles per house, giving 120 vehicles per house, possibly more.	The baseline inputs are not subjective or arbitrary.
85. One way traffic was proposed for part of the development. Whilst there are many combinations that could be created, this is a discussion that should be revisited.	One way traffic was not supported by County Highway Authority on highway safety grounds. The arrangement was confusing.
86. An access onto Wheeler Ave. would further distribute traffic.	Agreed. However, it could not be argued that it is essential to make the development acceptable, and it would require land not in the control of the Council(s) or the applicant and therefore it has not been taken forward.
87. Access at bottom of Cock Lane should be utilised to spread the load of traffic.	Traffic will still be able to access Cock Lane in the North and the South. The provision of a new spine road will simply limit the attractiveness of Cock Lane as the route of choice and ensure that it does not exceed its capacity limitations.
88. Do not believe internal roads should be linked because you will leave it to new residents to decide which route they take.	Quite how internal links are made is a matter that will come forward at the detailed design stage, however roads which are not linked undermine the effectiveness and resilience of the road network generally, and would limit the degree to which existing and new transport issues could be addressed through this development. With particular regard to Ashwells, it will be a matter for the Transport Assessment and design to determine the intensity of use of any particular access. As a general rule travel choice for residents is a good thing unless in so doing it leads to the overloading of an access and resulting highway safety concerns.
89. Development will increase traffic problems particularly at junctions with London Rd & outside the Middle School.	Modelling and transport analysis is underway. It will be necessary for any significant highway safety/convenience/capacity issues to be resolved. Speed management can be delivered as deemed necessary and reasonable.
90. WDC priority should be to sort out the traffic problems on the A40 rather than sending all the traffic to TG.	Works to the A40 are considered as part of the Reserve Sites Infrastructure Delivery Plan and New Local Plan Infrastructure Delivery Plan. There is no plan to send traffic to TG.

<p>91. Children are encouraged to walk to school. At 8.30am & 3.15pm children need to cross Cock Lane to come in & out. Some are dropped off by car which causes an obstruction on the bend at the start of Cock Lane where it abuts Barnes Corner. Any increase in traffic movements needs traffic projections modelled to see potential impact. At present there is a crossing patroller but he is due to retire & recruitment of a replacement will be difficult.</p>	<p>Modelling and transport analysis is underway. It will be necessary for any significant highway safety/convenience/capacity issues to be resolved.</p>
<p>92. Highway problems will be overwhelming, roads are not designed to cope with such a large volume of traffic that will occur from the developments.</p>	<p>Infrastructure issues are addressed by Reserve Sites Infrastructure Delivery Plan and New Local Plan Infrastructure Delivery Plan. It is acknowledged that there are significant legal, financial and physical constraints to upgrading infrastructure.</p>
<p>93. Additional traffic turning lower end of Pimms Grove from a quiet cul-de-sac into a ratrun.</p>	<p>Quite how internal links are made is a matter that will come forward at the detailed design stage, however roads which are not linked undermine the effectiveness and resilience of the road network generally, and would limit the degree to which existing and new transport issues could be addressed through this development.</p>
<p>94. More pedestrian crossings required.</p>	<p>The need for pedestrian crossings will be determined as the developments progress and Transport Assessments become available.</p>
<p>95. Instead of being "politically correct" & creating cycle lanes which don't/won't get used, WDC/BCC need to attempt to solve the real problems of supporting roads which must be updated/modified to cope with extra volume of traffic these developments will produce.</p>	<p>Infrastructure issues are addressed by Reserve Sites Infrastructure Delivery Plan and New Local Plan Infrastructure Delivery Plan which include measures for both automobile traffic and cycling and walking.</p> <p>It is acknowledged that High Wycombe is currently a car dependent town. It is also a historic town with physical limits to the extent that highways can be expanded. Therefore, the promotion of bus, walk and cycle is part of the Council's strategy for alleviating issues associated with the private car.</p>
<p>96. Traffic & congestion generate considerable pollution, impacting the air quality & litter. Proposed</p>	<p>Pollution from traffic will be assessed as part of any future planning application.</p>

development would increase traffic (& therefore pollution) during construction & also when new households move in.	
--	--

Cock Lane/Link Road/Spine Road/Hammersley Lane	
<u>Comment</u>	<u>Response</u>
97. Need a design specification for the spine road as it passes from parcel 3 to 4/5.	Agreed that this would be ideal, but resourcing issues and the absence of detailed levels information (existing and proposed), will limit how prescriptive we can be at this stage.
98. There is significant concern about the route of the Spine Road and relationship with levels, and resulting impact on landscape and the character of the residential development adjacent. It may be better to be less definitive about the route of the Spine Road until these aspects can be properly tested.	Agreed. Amend the brief to convey a more indicative route for the road, and include further guidance in respect to relationships between the road and adjacent housing. This would need to be done by LDA.
99. Housing layouts which minimise the need to remodel the topography and construct retaining structures should be considered.	Agreed. The brief already contains guidance in terms of minimising retaining structures but will be amended further to indicate flexibility in terms of layout to minimise the need to manipulate topography. Possible fish bone layout in respect of parcels 4 & 5.
100. All references to 'Link Road' should be changed to 'Spine Road'. A link road will encourage rat running. The term Spine Road better reflects the proposed primary function. Need to achieve a balance between the potentially conflicting requirements for the Spine Road to provide a connecting route between the new GV	Agreed – all references to link road to be changed to spine road.

<p>communities, and for it to act as a deterrent to through traffic between the A40 and TG.</p>	
<p>101. The primary function of the Spine Road should be as a local connection between new and existing places and not as a through route.</p>	<p>The spine road will both link the new development to existing places and attract traffic from Cock Lane, which currently serves a through route function. However, agreed that the road should be designed to attract additional traffic.</p>
<p>102. Junction of spine road with Cock Lane needs to be designed carefully so that it does not appear as part of a through route.</p>	<p>The spine road is intended to reduce pressure on cock Lane which is already at capacity . Annotation on Fig 5.26 states that link road will have priority.</p>
<p>103. There should be a clear description within the Development Brief of what the spine road should look like, how engineering will be dealt with on difficult terrain and how it should function (Text from Telford Millennium Village provided as an example).</p>	<p>Make addition to section 5.1 to include design specification for the road:</p> <p>Design specification for the spine road:</p> <ol style="list-style-type: none"> 1) Tree lined. 2) Focus for pedestrian and vehicular activity. 3) Follow natural contours of the land to minimise the need for engineering operations. Where engineering operations and land remodelling work is required: <ol style="list-style-type: none"> a. Vehicular and pedestrian routes may be split across levels; b. Soft (i.e. landscaped banks) rather than hard retaining features will be used as much as practicable. 4) Design speed of no more than 20 mph through changes to the street environment at 60-80m intervals, which may be achieved through any of the following. <ol style="list-style-type: none"> a. Variation in width of the carriageway and degree of enclosure (for example with buildings or street trees) so that the road pulses; b. Use of pinch points or horizontal deflection or otherwise features which must be driven-around. Avoid the use of speed bumps or humps; c. Restricting forward visibility or introducing arresting views; d. Integration of on-street parking, broken up by planting; e. 2 metre wide footpaths (3 metres if used for cycle too). f. Some tree planting should be semi-mature.

	<ul style="list-style-type: none"> g. Trees planted up to a maximum of 10-15 metres apart depending on street type and tree specification. h. The design of the spine road should change at the point where character areas change. i. The design of the spine road should incorporate materials which reinforce the slow-speed environment; j. The spine road should be designed to maximise wildlife movement (i.e. it should not sever wildlife corridors with significant engineering features).
<p>104. Pg. 40 of Brief, spine road described as 'providing a more appropriate link between London Road & TG than that currently provided by Cock Lane'. Sounds like a Wycombe bypass. Preferred description – 'providing access to the new developments and interconnection between them'.</p>	<p>Revise as follows:</p> <p>"providing access to the new developments and interconnection between the development site and surrounding urban area".</p>
<p>105. No justification for the claim in the Brief (para.3.4.1) that 'provision will need to be made for a 2 lane north/south link road'. It is accepted that Cock Lane should be widened as far as the Ashwell's entrance, but not as far as parcel 8. Jacobs own calculation of additional flows on Cock Lane from all the new sites is only 60 vehicles per hour at peak times. The following justification given:</p> <ul style="list-style-type: none"> a) It has been stated by BCC that Cock Lane is 'at capacity', and the Development Brief states that it is 'unable to accommodate a material increase in traffic volume' (para 3.4.1), but no convincing evidence has been provided to support this. Increase in traffic flows at peak times, according to the Jacobs report Fig 5B, is around 60 / hour, i.e. 1 extra 	<p>Following consultation with the County Highway Authority it is advised that Cock Lane is at capacity and therefore any material increase in traffic is likely to lead to safety/convenience concerns. Notwithstanding any development that may take place traffic volumes are expected to rise in any event. Any increase in peak flows will not occur uniformly over the peak period, but rather form peaks and troughs within the peak period. Cock Lane, due to the manner in which it operates, with a number of three-vehicle-long passing bays is particularly susceptible to increased traffic volumes. The addition of circa 500 homes in close proximity to this road, many of which would inevitably use the road, is expected to overload Cock Lane causing congestion and delay, which will cause frustration leading to diminished highway safety. The Jacobs Report is clear when it states:</p> <p><i>"Any vehicle access to Gomm Valley should be configured in such a way as to negate the need for traffic to utilise the narrow section of Cock Lane, unless the proposal also made provision for accompanying improvement works to Cock Lane"</i> (Para. 7.8).</p>

<p>vehicle per minute, and this could not realistically be regarded as a material increase in traffic volumes;</p> <p>b) the Jacobs report states that traffic should be <i>“encouraged to use the A40 London Road and discourage the use of Cock Lane with its substandard width and environmental constraints”</i>; (para 7.8, page 62);</p> <p>c) the northern section of Cock Lane is not needed for a bus service;</p> <p>d) there will be a significant impact on landscape, ecology and utilities that will need to be taken into account and mitigated;</p> <p>e) widening on the east side would involve the loss of many trees and an important hedgerow that is regulated by The Hedgerows Regulations 1997;</p> <p>f) the current width of the roadway is 3.5 - 4.0 metres, with an embanked verge on the east side of up to 1.5 metres and drop on the west side of over 1.0 metre. A doubling in width and dealing with the differences in level will require some challenging engineering.</p>	<p>The solution in the Development Brief is considered to appropriately balance the competing issues of:</p> <ul style="list-style-type: none"> a) providing highway capacity; b) minimising ecological severance; and, c) preserving the gap between HW and TG. <p>The impact of any widened section of Cock Lane can be minimised by maintaining the sunken character, replanting on the east side of Cock Lane and siting the footpath within the development site on higher ground. There is no dispute that the engineering will be challenging.</p> <p>It is acknowledged that the northern section of Cock Lane is not currently required for a bus service, but as Aviva and Carousel regularly review bus routing and the acknowledged marginal viability of the No.27 that the option of taking a bus along Cock Lane should be retained for the future. In all events a similar road geometry would be required for delivery vehicles, which is a common feature of modern living and should be encouraged in sustainability terms.</p>
<p>106. Spine Road cannot be justified by the need for a bus as the bus does not travel as far at TG.</p>	<p>Maintaining the option of a circular No31 route is considered to be a good future planning. The bus is not the sole justification for widening Cock Lane. Delivery vehicles that currently use Cock Lane would benefit from the same geometry of road.</p>
<p>107. Widening of Cock Lane would:</p> <ul style="list-style-type: none"> k. Encourage rat running through TG. l. Require loss of 200m of historic hedge. m. Create an ecological barrier. 	<p>It is acknowledged that Cock Lane is special and that widening it is a negative aspect of the proposal in character terms. However, there are also benefits in releasing this reserve site for development, which can only be realised by widening Cock Lane. On balance, the widening of a relatively small section of Cock Lane to release the other development benefits is considered to be appropriate.</p>

<p>108. Parcels 7 & 8 should be turned into a cul-de-sac & access onto Cock Lane provided at the Southern end of the narrow section of Cock Lane. This would serve to limit through traffic.</p>	<p>This would severely limit the quantum of development that Gomm Valley could accommodate without having a significantly adverse impact on Cock Lane. Gomm Valley is a long established Reserve Site for future development. The District and country as a whole is facing significant demand for housing. It would be very difficult to sustain an argument at appeal that development should be severely restricted on the site to preserve the top section of Cock Lane.</p>
<p>109. New access for Ashwell's should as a purpose built road carry traffic in both directions and take the majority of traffic generated as a result of the new housing.</p>	<p>Both the new access and the existing access to Ashwells are capable of accommodating the traffic associated with the development. It is good design and planning that large sites are served by multiple accesses. The precise split between accesses will be determined by the layout of the proposed development.</p>
<p>110. existing Ashwell's Road should not link to new housing. 30 dwellings max. Separated by bollards, but allowing access for emergency vehicles.</p>	<p>Not linking the new development through to Ashwells would represent a physical and functional barrier between the existing and new residents in TG. It would also reduce network resilience and undermine the case for introducing the second access in the first place. Quite how internal links are made is a matter that will come forward at the detailed design stage.</p>
<p>111. Opposed to bus service from TG to London Road.</p>	<p>This is not currently proposed. However, the option should be preserved for the future.</p>
<p>112. Opposed to No.31 being diverted into new site.</p>	<p>This is no longer proposed. The Development Brief has already been amended to reflect this.</p>
<p>113. Fig 5.19 - Area A: Run link road closer to / along edge of railway line to minimise impact.</p>	<p>Link Road has been aligned to generally follow site contours thereby minimising the landscape impact.</p>
<p>114. Of the options detailed, improvements & widening of Cock Lane is the least detrimental solution providing traffic light timings allow smoother, more frequent release of traffic onto London Road in rush-hour to prevent traffic queues extending to the bridge on Cock Lane.</p>	<p>Acknowledged.</p>

<p>115. Tailbacks on Common Wood Lane as a consequence of through traffic.</p>	<p>Transport Assessment will assess the impact on the surrounding highway network.</p>
<p>116. Vehicular Access pg. 15 & 16 - Help relieve congestion around Ashwells & Cock Lane, Wheeler Avenue must also be considered as an access point. Having Wheeler Avenue as additional access point will avoid this as cars that would have come out of the new development & turn right up Cock Lane could now avoid adding to this congestion around Ashwells, the Middle School & Crossroads as Wheeler Avenue will bypass this. Would also avoid lorries having to go past the Middle School & crossroads during the build & same for delivery vans etc. once build is complete. If objective is that the additional traffic should be distributed to minimise congestion in one area then Wheeler Avenue would be a good solution. Without the Wheeler Avenue access I challenge if the Development Framework Objectives are being met if all main access goes via only Ashwells & Cock Lane entrance.</p>	<p>It is acknowledged access through Wheeler Avenue in addition to the other accesses would be preferable in terms of travel choice and the permeability of the urban area. This would be equally true for access via Sandpits and/or Hammersley Lane. However, it is acknowledged that there are legal impediments to delivery (i.e. land ownership), which would in all probability lead to a ransoming of the site, which would make this option a significant disincentive for the land owner and potentially impact on the viability and deliverability of the site. Therefore, as desirable as an additional access through Wheeler Avenue may be, it is not considered that the Council could insist on its delivery to make the development acceptable.</p>
<p>117. The junction at New Road/St. John's Road/Church Road is already congested several times a day, any additional traffic would only exacerbate this (contrary to DFO 14). This would bring with it an increase in traffic pollution, particularly from stationary traffic. The Middle School is less than 100 metres from this junction.</p>	<p>The impact on this junction would be assessed at the application stage.</p>

<p>118. Advised speed humps are not an option as they require street lighting, however there are many other forms of traffic calming, which do not require street lighting, these can be found in Department for Transport guidance for Traffic Calming, which seems to of been overlooked by Axa's consultation in favour of non-explicit traffic calming.</p>	<p>A specification for the Spine Road including measures to slow traffic speeds has been added to the Brief. There is also very good guidance contained in Manual for Streets (MfS) 1 & 2, reflecting more recent thinking on street design. It is not necessary to repeat the guidance in Manual for Streets as this document already has an established provinece and therefore can be afforded weight in any decision making exercise.</p>
<p>119. Spine Road would take it down the rear of houses in Pimms Close & Grove. This road is likely to be very busy, possibly taking the bulk of traffic from Parcels 6-8 & now using Cock Lane I would suggest an alternate route. At last Liaison Group the Chairman/RH said that there were ways & means of preventing this route becoming a rat run, but failed to offer a suggestion to how this could be accomplished. The existing road system cannot cope & can only get worse. Would suggest an alternate that some relief could be obtained for noise & intrusion from Spine Road to Pimms Grove & Close would be to route the road through the bottom of the valley & connect it into Parcel 7. Parcel 6 would only then require an access road to Parcel 5 (&then onto the Spine Road), Parcel 6 would then offer much quieter environment for the residents. This with the pedestrian access at the end of Pimms Close would do much to safeguard the environment for existing & future residents.</p>	<p>From the outset the Development Brief has been landscape led. The provision of a road at the bottom of the valley would introduce an urban feature into an area that is intended to be retained as undeveloped. The benefits arising from any relocation of the spine road into the bottom of the valley are not considered to be outweighed by the costs.</p>
<p>120. Wheeler Avenue is more suitable as the main point of access than Ashwells. The roads on this estate are wide and already open out on to a main road. If as is proposed the 31 bus is to go into the</p>	<p>Sequentially the Ashwells access is considered to be preferable to Wheeler Avenue. Wheeler Avenue is a relatively narrow long winding cul-de-sac. A further extension of this cul-de-sac would not be desirable in urban design terms. Ashwells is of sufficient width to carry two way traffic and has direct access to the</p>

<p>new estate this is a far better driving option than coming down Cock Lane, past a junior school & turning into Ashwells. Cause less disruption from traffic point of view & be safer. Accept some traffic may come through Ashwells but Wheeler Avenue is level & offers access straight into village with distribution to Beaconsfield, Hazlemere & beyond.</p>	<p>main road network. Whilst the Council is not pursuing the opening of Wheeler Avenue as it is not essential to make the development acceptable it is acknowledged that it would be desirable as a second access to the site in the interests of urban permeability.</p>
<p>121. At beginning of this process there was a commitment not to widen Cock Lane, now this is being proposed.</p>	<p>Jacobs and the County Highway Authority have been consistent from the outset that in order to release Gomm Valley for development a two lane road was required from north to south through the valley. Initially Jacobs proposed the widening of Cock Lane. There were strong objections from the Council and public alike to this proposal. As an alternative a spine road through the valley was proposed in the second iteration of the Jacobs report. It was for the Council to determine the precise alignment of the spine road. Four options were considered as presented to the Liaison Group in September 2017.</p> <p>https://www.wycombe.gov.uk/uploads/public/documents/RH-Meeting-Layout-Presentation-090915.pdf</p> <p>It was concluded that the sensitive widening (i.e. a wider sunken lane) of the top section of Cock Lane was preferable to a new road passing through the valley, which would lead to a duplication of infrastructure and erode the sense of a gap between High Wycombe and Tylers Green.</p>
<p>122. I realise there is reluctance to challenge the use of Wheeler Ave as a potential access route due to a resident claiming part of the ransom strip under the 'adverse possession' principle, but I would challenge whether the cost of re-acquiring this portion of the ransom strip has been compared to the cost of constructing a whole new road from Cock Lane. Has this been properly addressed & costed?</p>	<p>Whether Wheeler Avenue was opened up or not a route from north to South would still need to be provided. Wheeler Avenue would not be suitable for taking large volumes of traffic. Therefore the cost of creating an access onto Wheeler Avenue will be an additional cost. The option has been tested as much as it needs to be to obtain the answer. The Planning Department is satisfied that it cannot reasonably insist on a Wheeler Avenue access being opened.</p>

<p>123. There is currently no safe pedestrian access along Hammersley Lane (footpaths); this should be resolved irrespective of the development.</p>	<p>The only viable means of providing pedestrian access beneath the railway bridge on Hammersley Lane is to signalise the bridge. This has been assessed, but the highways impact is considered to be too severe to justify pursuing this option. As an alternative a pedestrian/cycle route is proposed via Gomm Road. The direction of travel is consistent with the majority of key destinations.</p>
<p>124. Object & oppose opening of vehicle access point at Pimms Close. Been led to believe on previous maps it would be Pedestrian access only. Potential impact on</p> <ol style="list-style-type: none"> 1. children's play area on established Green; if opened to vehicles - lives at risk PH1. 2. Increase traffic on Cock Lane. 	<p>Urban areas should be as permeable as possible for all modes of transport. Therefore, the starting point is that all accesses are opened up unless there is a good reason not to.</p> <p>In order for buses to be viable and therefore sustainable in the longer term they need to pass as many residential properties as possible. It has been proven that the closer houses are to bus stops the more likely residents are to use the bus.</p> <p>The potential for vehicular traffic to cut through Pimms Close/Grove is a potential issue, which will need to be analysed and modelled.</p> <p>At present it is unclear whether a vehicular access at the end of Pimms Close is on balance desirable. Therefore, for the purposes of the Development Brief the option should be kept open until further information such as bus viability becomes available.</p>
<p>125. A vehicular access from Pimms Close would result in a serious reduction in environmental living standards for existing residents? A pedestrian access from Pimms Grove to the Spine Road to catch the bus would dispense with the need for the bus to pass along Pimms Grove/Close.</p>	<p>Options for bus routing are currently being considered. Ultimately, the Council need to be convinced that the bus will be viable/sustainable without subsidy in the long term.</p>
<p>126. The opening of the barrier at the lower end of Olympic Way will enable the residents of the 164 dwellings (Cars 180?) under construction to exit to Wycombe instead of having to exit onto Cock Lane.</p>	<p>There are significant levels and engineering issues involved with this approach and it is not within the scope of this brief to address.</p>

<p>127. Entry & Exit Pimms Grove - Olympic Way attached photos PH3 & PH4 demonstrates dangerous situation that will be created by an access point to spine road at bend of Pimms Grove. Entry into Pimms Grove from Cock Lane is dangerous as vision of oncoming vehicles in both cases is severely impaired.</p>	<p>The initial assessment is that it is possible to create a safe access onto Pimms Grove. Any application would need to be supported by full technical drawings indicating that the requisite visibility splays can be achieved.</p>
<p>128. Currently extreme congestion outside TG Middle School at drop-off/pick-up times, which would be an unaddressed bottleneck if Link Road was part of this development. Peak-time traffic build-up at junction of Cock Lane & London Road would need to be managed due to new traffic being generated. Additional car parking at existing school needs to be created & designated road crossing to school.</p>	<p>The Ashwells development can potentially contribute to easing congestion around the school.</p>
<p>129. Sect. 3.4.1; access from Hammersley Lane should be restricted to housing in "Parcel 1" & not made into a through road with pedestrian access through to the rest of site, to minimise extra traffic in Hammersley Lane & junction with London Rd - Bus route can enter the valley via Gomm Road (5.1.3)</p>	<p>Initial indicators are that a bus will only be viable if it can serve areas in addition to the site, which are not currently served by a bus such as Robinson Road. In the event the bus is no longer required and/or a link from Gomm Road to Hammersley Lane is no longer required, the vehicular link from Gomm Road to Hammersley Lane will need to be reviewed.</p>
<p>130. Ashwells not wide enough nor fit for the volume of 2 way traffic proposed.</p>	<p>Initial indications are that Ashwells would wide enough to serve the site. However, it is acknowledged that an additional access onto the site, which would spread the load, provide network resilience and open up opportunities for additional development is preferable. The traffic split between the two accesses will be determined by the resulting layout.</p>
<p>131. Viable additional/alternative routes through Carter Walk & Hammersly Lane. Traffic burden has to be more equally distributed to preserve safety.</p>	<p>Efforts will be made to connect the site to the existing network in as many ways as possible. Connections to Carter Walk and Hammersley lane have proven to be impractical at the northern end of the site.</p>

<p>132. Road MUST be completed & commissioned prior to any housing construction. Cock Lane is already subject to excessive traffic, much of which is heavy vehicles involved construction of Olympic Way. Lane is marked as unsuitable for such traffic & currently showing signs of subsidence above railway bridge.</p>	<p>The phasing of delivery of infrastructure and housing will be informed by more detailed modelling as the proposals progress.</p>
---	---

Infrastructure (doctors, schools, surgery's, police, surrounding road etc).	
<u>Comment</u>	<u>Response</u>
<p>133. Infrastructure is insufficient to cope with proposed additional traffic; in particular London Rd.</p>	<p>This matter is not addressed by the Development Brief. This matter is addressed by the Reserve Sites Infrastructure Delivery Plan.</p>
<p>134. Cycle Route from Area D to TG village is too narrow in parts to accommodate walkers & cyclists. Cyclists dismount signs need to be erected & chicane barriers erected at pinch points.</p>	<p>This matter is not addressed by the Development Brief. This matter is addressed by the Reserve Sites Infrastructure Delivery Plan.</p> <p>The aim will be to take all opportunities available to deliver a full walk/cycle route. However, where this is not physically possible alternative options will need to be considered. Cyclists may be required to dismount.</p> <p>Para. 5.1.5 needs to be amended to reflect the need for flexibility.</p>
<p>135. 5.1.5 - Link to Mickfield: no-one uses it, and will need a funicular railway to improve it.</p>	<p>Officer to ride route to assess its suitability. This matter is addressed by the Infrastructure Delivery Plan and therefore no change will be required to be Brief.</p>

<p>136. Emerging plans indicate Ashwells is unlikely to be served by a bus on site but rather the existing service. Also, the distance to the nearest bus stop is likely to be slightly in excess of 400 metres. This is not covered in section 3.4.4.</p>	<p>Agreed. Para. 3.4.4 needs to be amended to include option of Ashwells using existing service.</p> <p>Following additional work done on bus provision we now know there are only three options:</p> <ol style="list-style-type: none"> 1. Extend No.27 to include Southern end of the site entering at Pimms Grove and exiting onto Hammersley Lane; 2. Ashwells to utilise existing service (unviable to extend existing service into No.31). Much of the site is just over 400 metres of No.31 or the bus proposed to the South. Therefore, whilst this is not ideal it is tolerable in the circumstances; 3. Future proofing to ensure the spine road is designed to accommodate a bus should the opportunity present itself.
<p>137. Should a school be built behind Peregrine, and residential traffic funnelling out down Gomm Road, I foresee that congestion will back up the new access road, affecting Peregrine business, residents and school run traffic adversely.</p>	<p>Three sites were considered for the school. The proposed site was considered to be the sequentially most preferable by the Education Authority.</p>
<p>138. Building homes without improving the infrastructure is pure folly. The frustration with current residents is housing continues to be developed but there is no infrastructure capacity for the increased population. The A40 is a mess with massive tailbacks at times. Trains are overloaded causing delays & at times the inability to even board.</p> <p>Schools in the area are already oversubscribed. Where are all these children going to go to school? What planning is in place to provide school places Before these homes are populated.</p>	<p>The Council has a Reserve Sites Infrastructure Delivery Plan and the New Local Plan has an Infrastructure Delivery Plan. The Development Brief also clearly indicates the provision of a school on the site.</p> <p>All large sites will be expected to deliver infrastructure and/or contribute financially towards it.</p> <p>The timing of infrastructure delivery will be site specific.</p> <p>Contributions for individual sites must be necessary and reasonable in scale and kind.</p> <p>New development cannot be expected to deal with existing issues. Although in the event that development delivers infrastructure that has wider a public benefit</p>

	<p>this is a positive outcome. In this instance the site is expected to provide land for a school, which will address both its needs and those in the wider area.</p>
<p>139. No mention of doctors surgery at which new residents will be eligible to register. Addition of new residents at Penn Surgery would add huge burden to current practice, both in terms of patients, location, building & staffing (DFO 13).</p>	<p>This matter is not addressed by the Development Brief. This matter is addressed by the Reserve Sites Infrastructure Delivery Plan.</p> <p>NHS are responsible for the provision of surgeries. The NHS were consulted, but did not put the case for the development to provide or contribute towards additional surgery provision.</p>
<p>140. The plans as proposed do not mention necessary services, such as school/s, doctors, shops, which will have an even bigger impact on the roads as residents will be forced into their cars in order to access such already overstretched services further afield.</p>	<p>This matter is not addressed by the Development Brief. This matter is addressed by the Reserve Sites Infrastructure Delivery Plan.</p>
<p>141. With no rail access to Reading or Slough, this will only increase the strain on already congested local roads as more people use Wycombe as a dormitory town. With no proposed developments for Chiltern Rail on the horizon & introduction of Crossrail as well as the electrification of the Great Western routes, Reading & Slough will become more attractive, more accessible for both businesses & residents of Wycombe wishing to commute. Presumably the development of Princes Risborough will mean there will be less seats at HW & Beaconsfield to service additional commuters from new development.</p>	<p>This matter is not addressed by the Development Brief. This matter is addressed by the Reserve Sites Infrastructure Delivery Plan.</p> <p>With particular regard to future rail investment, this is a matter for Chiltern Rail and Network Rail. An increase in the number of passengers at any given point, can only improve the business case for investment.</p>

<p>142. Proposed new schools, one at the bottom of development (primary) & one at Penn School (sixth form), with all pupils, staff & traffic implications is horrendous. This proposal would create too much extra traffic.</p>	<p>The impact of the proposed school on the site will be assessed as part of the overall traffic impact from the site.</p> <p>Penn School will need to be assessed on its own merits as and when development is formally proposed. It is not presently clear that a school will be developed on the site.</p>
<p>143. Proposed School; we understand the need for a school but reject to it being built on the proposed site. Sensible site for a school is on the Taylor Wimpey Land. Thereby releasing the proposed site for affordable houses that would be close to Public Transport & other facilities, reducing the need for cars. The development would be screened as in the immediate forefront is the railway & commercial buildings & in the far distance is woodland. Parcel 4 situated behind the Taylor Wimpey Land which is to be developed is far more prominent. If it is said that the Taylor Wimpey land is difficult to build on we suggest they visit the site of the Premier Inn on the London Road; steeper plot contains large restaurant, hotel, annex, 3 car parks, houses, children's play area all on a smaller area of land.</p>	<p>This option has been considered as part of the preparation of the Development Brief. The Council has taken landscape advice from numerous sources. All have agreed that the shoulders of the valley are of principal importance in landscape terms and therefore this option has not been pursued.</p>
<p>144. Pg. 74 Sect. 5.10.2 - Stipulation new primary school would serve needs of Ashwells/Gomm Valley/Terriers Farm is fanciful. Terriers Farm is too far away with nearer schools & Ashwells would tend to gravitate towards TG being close to the TGMS.</p>	<p>It is not proposed that a school at Gomm Valley serves Terriers. A new school at Gomm Valley would however add capacity to the system, which would enable capacity to be freed up in schools nearer to the Terriers site. School catchment areas would need to be reviewed following the creation of any new school.</p>

Chapter 1 of the Brief (Introduction)

Comment

Response

145. Development Brief needs to start with a vision of the type of place that should be created. How it will relate to the local context and what other criteria should be taken into the design process to create successful new communities. Advise:

- Provision of decent homes of the right quality and at prices people can afford
- Proposals that challenge the traditionalist’s perception of residential planning and design
- Housing designs that respond to modern living patterns
- Improvement in space standards (UK currently has the lowest space standards in Europe)
- Encouragement of house designs that allow a variety of formats & internal layouts etc.

Agreed. Clear vision is required, which identifies particular qualities to be safeguarded. See comment 34 for wording.

The Council cannot affect the price of homes. This is a matter for the market whether sold on the open market or used as affordable housing. However, we can ensure that a mix of house types are provided.

Space standards are addressed by the emerging Local Plan. It is anticipated that the Local Plan will be submitted for examination in the summer and therefore will be gaining weight as any future application progresses.

Chapter 2 of the Brief (Planning Policy Framework)

Comment

Response

146. Section 2.3; note that HW Reserve Sites Transport Framework (Jacobs) & Wycombe Reserve Sites Infrastructure Delivery Plan are described as “draft guidance documents” not mandatory regulations.

The Transport Framework and Infrastructure delivery plan are not mandatory regulations, but the word “draft” should be removed.

147. Para. 2.3 on Supplementary Planning Guidance would benefit by being followed with ref. to other documents that carry planning weight or simply

It is not considered desirable to list all documents that may or may not be useful in the Development Brief. These documents exist irrespective of the Brief and will be given weight in the decision making process according to their provenance. If

<p><i>'other documents'</i>. These will include the Buckinghamshire Landscape Character Assessment - Wycombe District Landscape Character Assessment (2011) and in particular LCA 19.1 for the High Wycombe Settled River Valley. Additionally they may also include the AONB Position Statement - Development affecting the setting of the Chilterns AONB,</p>	<p>a particular requirement of the Brief is supported by more detailed guidance in another document then it should be referenced at that point. In particular given that the site is not in the AONB, it would be inappropriate to require compliance with AONB guidance. Although it is acknowledged that the content of some of these documents may be useful.</p>
<p>148. Pg5; Last para. Government's planning policy Framework is singular so it should readand how this is expected..... It might be better to use capitals for Government's planning policy Framework i.e. Government's Planning Policy Framework.</p>	<p>Agreed. Para.2.4 needs to be revised.</p>

<p>Chapter 3 of the Brief</p>	
<p><u>Comment</u></p>	<p><u>Response</u></p>
<p>149. Support the policy at 3.3.1 (p.12) that 'Ashwell's site should reflect the lower density & less formal development patterns of Penn & TG whilst also ensuring the land is used efficiently to limit the release of greenfield land'. Broadly agree with the design features suggested for the site.</p>	<p>Acknowledged.</p>
<p>150. (P.12 &13) informal gravel lanes are only found on TG Common & should not be included in Ashwells.</p>	<p>Would not wish to be this prescriptive at this stage. A gravelled lane could comprise an acceptable form on access on a secondary road and/or shared drive.</p>
<p>151. (bottom p.12) 'whilst' typo.</p>	<p>Agreed. Change.</p>

152. (p.13) should include photos of Wheeler Ave & Ashwells.	Agreed. Change. As local context this is relevant.
153. (p.15) omit reference to extension of Wheeler Ave.	Extending Wheeler Avenue is an option, just not one that we wish to pursue and therefore it should remain as an option.
154. (p.30) should include rising main.	Agreed. Needs to be provided by Savills
155. Description of local context (para. 3.1.2) should highlight the variety in the character of the surrounding area e.g. Pimms Grove, TG, Gomm Place etc.	This section deals with the site context rather than describing the character of the surrounding area, which is dealt with later in the brief in section 3.3
156. There should be a large scale plan showing the site in its strategic context i.e. location relative to town centre, Junction 3 (M40), Handy Cross Hub, Wycombe Marsh retail park, historic core TG etc.	Agreed. Add detail to figure 3.1
157. Fig. 3.3 contains a lot of important info., but is difficult to read. Not clear what the circles represent.	<p>Print size is an unfortunate side effect of trying to display a lot of info on a small page that can be printed on most printers.</p> <p>Key required for distance circles.</p> <p>Increase print size as much as practicable.</p>
158. Fig. 3.1 does not contain enough contextual info.	The plan is designed to show the sites relationship to the urban agglomeration of High Wycombe. Further information will be added however this diagram is not intended to be exhaustive.
159. Coverage of parking in section 5.4.1 on pg. 54 is inadequate. Residential Design Guide is not adopted & therefore irrelevant. Need more information on parking within the Brief. WDC should make reference to the section on car	Parking is covered by the recently adopted County Parking Standards, which essentially adopt the parking standards set out in the Daws Hill Development Brief. It would be inappropriate, unnecessary, confusing and ultimately unhelpful to duplicate existing design guidance in the Development Brief.

<p>parking in the Development Brief for Daws Hill (Section 6.2.3 on pages 26/27).</p>	<p>The Residential Design Guide is not irrelevant. It is a draft document that has undergone public consultation and therefore can be afforded weight. It is beyond the capacity of the Development Brief to internalise all other guidance documents. At 76 pages it is already an extensive document.</p>
<p>160. Would be helpful to have a plan showing the existing bus routes.</p>	<p>Agreed. Add to the access and movement diagram (Fig.3.6) Page 16.</p>
<p>161. Two paras. at top of second column on p 12 (3.3.1) are confusing.</p> <p>First para. refers to 'The Site' being 'edge of settlement'. 'The Site' includes Ashwells, therefore presumably Ashwells is regarded as being part of the 'edge of settlement' & should take on different form from that of the historic core of P&TG. This is then somewhat contradicted by the contextual images, all of which are of the historic core, which might be 'reinterpreted' in designs for Ashwells.</p> <p>The second para. then states that Ashwell's should establish a design language that is 'appropriate to its settlement edge and the immediate context'. Does this mean that the immediate context (i.e. Carter Walk/Wheeler Ave/Ashwell's) is also regarded as 'edge of settlement'?</p> <p>This is not to say that the content of the 8 bullets in the second column are inappropriate as design guidance for Ashwells, but it might have been helpful to define where 'edge of settlement' sits in the settlement hierarchy & what this might mean, if anything, in adopting a different approach to design.</p>	<p>Amend to clarify.</p> <p>Ashwells will be the new edge to Penn & Tylers Green, as Carter Walk etc are the current edge between the developed area and the undeveloped land beyond.</p> <p>Add different photos to reflect these more recently developed areas.</p> <p>Agree some of the wording in the second column needs to be re-worked to explain this more clearly.</p>

<p>162. Para 3.9 Contradiction here between the statement that the northern end of the site contains the majority of the BMV quality land & the 'boxed' statement: "lower quality land should be preferred where possible". It is not made clear what the "other design considerations" are that should be balanced with the "potential loss of higher quality agricultural land".</p>	<p>Para. 3.9 Delete 'other design considerations' and replace with 'other planning consideration'. It would simply take too long to list all other planning considerations. Essentially it is everything in the Development Brief, Infrastructure Plan, Development Plan and any other material considerations. The fact that Ag. Land is going to be built on is a negative aspect of any proposal, but necessary in this case for landscape and place making, infrastructure and housing delivery reasons.</p>
<p>163. Section 2.3 - The 'Tylers Green' sign is still in Hazlemere. Move it 1cm lower.</p>	<p>Amend Figure 3.1 by moving TG sign south.</p>
<p>164. Section 3.2.2 - Text should say "some limited" before 'employment uses'.</p>	<p>Not necessary at this stage. We are not describing the proposal, we are identifying opportunities. If development needs were different much more of the site could in principle be released for employment.</p>
<p>165. Section 3.2.1 - Build Form re Ashwells: It is vitally important that WDC ensure that any build is as stated, i.e. "appropriate to the immediate context (modern detached houses)"</p>	<p>Acknowledged. However, being appropriate to the immediate context does not mean copying the immediate context.</p>
<p>166. Section 3.3.1 - Density numbers are incorrect (not up to 25 DPH) re Ashwells & should be corrected to reflect recent agreement. The weighted average density of the adj. developments (existing Ashwells +Wheeler Ave. & Carter Walk + Sandpits is 13.65 DPH / below 15 DPH. This is a point of fact & must be included in the DB & taken into account in any actual proposals.</p>	<p>Amend density section to correctly quote density in the existing area. Density calculations will be taken into account as a factor influencing design.</p>
<p>167. These photos are all of the P&TG Conservation Area, which forms only a small part (less than quarter of the area & only about 10% of the</p>	<p>Agreed. Need a more representative sample of photos.</p>

<p>housing of TG). This is inappropriate, they should be replaced by two or three photos from each of the 5 or 6 more recent / mid to late 20th Century developments in TG & especially of the mainly detached 3-5 bed houses in the parts closest to Ashwells.</p>	
<p>168. Section 3.4.1 should be clearer. There are, not “maybe” issues with land ownership, etc. and should add “so this potential access route has been ruled out / has not been taken forward”.</p>	<p>Agreed. Amend final bullet point in para. 3.4.1 to say: “However, due to land ownership issues and the limited planning benefits in opening up this access as a consequence of the width, length and geometry of this existing cul-de-sac, this option was not pursued”.</p>
<p>169. Fig. 3.6 - Remove Wheeler Ave.access arrow (see above).</p>	<p>It would be inappropriate to remove the arrow as it remains an access option no matter how unpalatable it may be to local residents.</p>
<p>170. Section 3.4.4 - No interest in diverting bus #31 into Ashwells. Jacobs indicates only 8 passengers in rush hour = about 2 per bus so uneconomic (according to bus companies), unnavigable (tight corners & narrow roadway past Middle School) & overwhelmingly bad for existing users who would suffer 10 minutes delay to their trips. New residents can easily walk 400m or so to existing #31 route or to terminus of proposed extension of #27 route.</p>	<p>Bus is not intended to access Ashwells. Amend section 3.4.4 to reflect work done on bus strategy.</p>
<p>171. 3.6.1 - Local Wildlife Site; LWS sites are relatively insignificant - they are not supported by the national government, but they are at least meant to be areas that “support wildlife rich habitats or particularly important species”. The GV LWS may have met this criteria in the past (when was it designated?) but patently does not now do so. All that there is now is a patch of scrub with little or no wildlife activity. It is now defunct.</p>	<p>Disagree. LWS are weighty material considerations. It is acknowledged that the GV LWS is in need of attention, but it remains worthy of its designation. The potential to rejuvenate the LWS as a consequence of allowing development on the site is a factor weighing in favour of supporting development. Seed banks associate with chalk grassland habitats can be stored in the ground for a number of decades after they have become scrubbed over.</p>

<p>172. Section 3.6.4 - Birds: The Red Kite is no longer in the latest Red List (see BoCC4).</p>	<p>Acknowledged.</p>
<p>173. Section 3.10 - Utilities: Section still fails to show or mention:</p> <ol style="list-style-type: none"> 1) the 6" pumped sewer (and its 6m wide exclusion zone!) running from the pumping station along the side of the Ashwells houses up to Ashwells Road, then directly across the top field to the side garden of #47 Wheeler Ave, 2) the 11.5kV electric cables (3) running from the transformer up to Ashwells Rd 3) requirement for a 15m exclusion zone around any pumping station. 	<p>Amend to reflect these items of infrastructure.</p>
<p>174. Fig 3.12 - Map should be marked Fig 3.14 (not 3.12).</p> <p>Delete Wheeler Ave arrow.</p>	<p>Agreed. Re-label Fig. 3.12 to 3.14.</p> <p>Do not agree that Wheeler Av arrow should be deleted</p>
<p>175. Wording on pg. 15 is misleading "extension of Wheeler Ave, though there may be issues relating to land ownership, changes in levels & capacity. There is no change in levels & capacity is unproven.</p>	<p>Unclear why words levels and capacity have been used. Amended. Text already provided.</p>
<p>176. Parcel 4 & 5 impinges on land identified as being highly visible in fig. 3.8</p>	<p>It is acknowledged that parcel 4 will impinge on one of the valley shoulders. However, due to the arrangement of field boundaries, which are proposed to be preserved and offer a degree of screening, and the overall layout of development, it was not considered development of parcel 4 could or should be resisted. Parcel 5 has not been identified as being of the highest landscape value within the valley, but does contribution to the sinuous valley landscape form on the valley bottom.</p>

	For this reason development has in the most part been directed to the western slope leaving the valley bottom and eastern slope largely free from development.
177. Pg. 14 when dealing with topography would benefit from ref. to <u>'is designed in response to topography, including any inter-visibility with the surrounding landscape character and including the Chilterns'</u> .	Agreed in part. Some words added to the Brief however there are no ready views of the site from the AONB
178. Pg. 12; 2nd Para. – The Mormon Church of Jesus Christ & Latter Day Saints is not on the A40 London Road. It is actually situated off Hammersley Lane (Pedestrian Entrance) and off Brambleside (Vehicular Entrance). The other church on the A40 London Road, about 4 doors from Wycombe Marsh Baptist Church is St. Annes C of E Church.	Agreed. To avoid further confusion delete “which are located on the A40 London Road”
179. 3.2.5 – We feel the title Recreation is misleading as only sports facilities are listed and as there are no recreational play facilities in the area we are aware of. We think perhaps it should indicate that recreational play facilities are being included in the planning. We hope these facilities will take into account the lack of play facilities in the adjacent areas to the south of the site.	Agreed. Paragraph refers to sport facilities. Replace the word 'Recreation' for 'Sport' Play facilities will be publically available to all children. Although it is likely those closest to it will be most likely to use the facility.
180. Pg. 14 - Blue/green block – In full agreement with this statement regarding the development of steeply sloping sites as we feel the integration of any development into the landscape is essential & must respect the topography of land.	Acknowledged.

<p>181. Pg. 15 (second para); Capacity – ‘which will be impacted by the Reserve Sites’ – Do they mean exacerbated by the Reserve Sites?</p>	<p>Agreed. Replace ‘impacted’ with ‘exacerbated’.</p>
<p>182. Pg. 1; Access -2nd Bullet point – (refer to 3.12 Utilities) - this should be: 3.10 (pg. 31). Also we think Southern Electricity Board should probably read SSE (Scottish and Southern Electricity). Blue/green block – We feel this is essential.</p>	<p>Acknowledged.</p>
<p>183. Pg. 16 – It would be more helpful to use dissimilar colours for the primary & secondary roads.</p>	<p>Acknowledged. Stylistic. Changing this would require significant resource for little gain.</p>
<p>184. Pg. 17 – We agree the rights of way network across the site needs improvement but we wonder how achievable this is given the topography. Generally the public transport system needs close scrutiny to develop sensible routes that go through the site.</p>	<p>Acknowledged.</p>
<p>185. Pg. 19 – Sentence before the Blue/green box should refer to the Chiltern Way.</p>	<p>Agreed. Replace ‘Chilterns’ with ‘Chiltern’.</p>
<p>186. Pg. 22 – We think the Figure is labelled incorrectly as 3.7, we believe this should be 3.9 to match the text on pg.21.</p>	<p>Agreed. Amend fig. 3.7 on page 22 to 3.9.</p>
<p>187. Pg. 23 – 3rd Para – Looking from the south up the Site you are standing in the Wye Valley looking north towards TG and Penn.</p>	<p>The statement is not direction specific. It describes a very general characteristic of the area.</p>
<p>188. Pg. 24 - We think the Figure is labelled incorrectly as 3.8, we believe this should be 3.10.</p>	<p>Agreed. Amend fig. 3.8 on page 24 to 3.10.</p>

<p>189. Pg. 25 – Right hand block of text – 2nd paragraph commences ‘Figure 3.8 illustrates... We believe this should be Figure 3.10.</p>	<p>Agreed. Need to align text with correct Fig numbers.</p>
<p>190. Pg. 26 – The key does not appear to be consistent with Figure 3.11 and in a number of cases the shading is not clear.</p>	<p>The key is consistent however it is acknowledged that the hatch/colour selection is not as clear as it could be. This is in part a resolution/printing issue. Amending this would require a significant resources to achieve the same outcome in the end – it would need to be done by LDA.</p>
<p>191. Pg. 29; 3rd para – Figure 3.10 should read Figure 3.12. We agree careful assessment of flood risk is essential for extreme events when submitting the application for development.</p>	<p>Agreed. Need to align text with correct Fig numbers. Any formal submission will need to be supported by a Flood Risk Assessment.</p>
<p>192. Pg. 32 – Figure 3.12 should read 3.14 and then the reference at the bottom of Page 31 is sensible. Whilst we appreciate there is a considerable amount of information to be shown, a better choice of colours would make the whole figure more discernible.</p>	<p>Agreed. Need to align text with correct Fig numbers. Review colour scheme. Amending this would require significant resources to achieve the same outcome in the end – it may not be worth it, and anyway would need to be done by LDA</p>
<p>193. Pg. 12 - Blue/green block - At the bottom right of the page has an interesting new word ‘shilst’ which should obviously be <u>whilst</u>.</p>	<p>Agreed. Replace ‘shilst’ with ‘whilst’.</p>
<p>194. Pg. 15 - End 3rd Para – Think ‘Access’ is in the wrong position as it goes with the next paragraph. - Pedestrians – 2nd bullet point – inconsistency in use of capitals on directions.</p>	<p>Agreed. Insert space before Access on page 15.</p>

<p>195. Para 3.4.2 - Pedestrians – 2nd bullet point – inconsistency in use of capitals on directions.</p>	<p>Agreed. Capitalise all North, South, East and West.</p>
<p>196. Pg. 17 – 2nd Sentence needs rewording as the meaning is not clear. - 3rd Sentence – Think it should read ‘The’</p>	<p>Agreed. Revise first para. p. 17 to read: “A number of informal footpaths also exist within the Site. There is an opportunity to improve existing public access on the Site and the Sites links to the wider Public Right of Way Network. The”</p>
<p>197. 3.4.3 - 1st para – last sentence – Think this should read Buckinghamshire County Council.</p>	<p>Agreed. Replace ‘Buckingham’ with ‘Buckinghamshire’.</p>
<p>198. Views outside The Site – 2nd para – south east and south west or southeast and southwest? Please could we have consistency? - Views outside The Site – 4th para – 5th line needs rewording.</p>	<p>Agreed. Use southeast format. Not clear.</p>
<p>199. Pg. 27 – 2nd bullet point – last sentence – should be is required....</p>	<p>Agreed. Insert space after ‘is’.</p>
<p>200. P12 – 3.3.1 – In order to be ‘appropriate in its immediate context’ the dwellings must be modern, detached 3-5 bed houses like those on Wheeler Av and Ashwells. The photos in the brief do not this requirement.</p>	<p>It is not accepted that any new development must simply echo existing development in Wheeler Av or Ashwells. TG is a diverse area with a diverse range of house types. There are some common features such as a lean towards more rural densities and strong structural landscaping, which should be carried forward into any new development. Moreover, adopted and emerging policy requires a mix of house types, tenures and sizes to cater for the mixed communities in which we live and therefore the Development Brief cannot require a relatively homogenous housing form of 3-5 bedroom detached dwellings simply because that is what is</p>

	adjacent to the site. Planning must look forwards as well as backwards otherwise nothing will change.
201. The stated housing densities are incorrect. The 25 dph housing density is not justified. A figure of 20dph is more appropriate.	The Development Brief requires around 25dph. This does not preclude 20dph. The expected dwellings per hectare is merely a guide as to likely acceptability to steer future developers towards lower density solutions. The more important factor is achieving an acceptable design. The density is the outcome at the end not a constraint to be factored in at the outset. Given the need to make efficient use of land in the interests of limiting green field land take it is not considered that the Development Brief should be so prescriptive as to pin point a density of 20dph or less at this stage.
202. Pg. 24 –Reject the eastern area of Ashwells is the least constrained area as it is an over-simplification of the topography. Directly east of Ashwells is relatively flat but south of Ashwells, or south of Greenridge more accurately, has some relatively steep topography that will deliver landscaping & other related issues. Land to the south of Greenridge should be added to the most constrained areas.	Cannot find statement that eastern area of Ashwells is the least constrained area.
203. Pg. 28 –Greenridge unmentioned in list of roads yet Ashwells & Lancaster Drive mentioned.	Pg. 28 is a diagram. However, agree in principle that Greenridge needs to be mentioned where relevant.
204. Pg. 31 –There is no protection to Ashwells & Greenridge unlike many other areas bordering the site that have natural protection.	Brief has been amended to reflect the bespoke design requirements to manage the relationship between Parcel 11 and the properties in Ashwells.
205. Pg. 33 – Whilst this is a large scale, the topography does not seem to accurately detail the slopes in the north west corner of site.	Topo survey is at a large scale. It is understood that the relationship with Ashwells/Greenridge is special. Brief has been amended to reflect the bespoke design requirements to manage the relationship between Parcel 11 and the properties in Ashwells.

<p>206. Sect. 3.3; divided into 2 subsections (Penn/TG & HW). No mention is made of Loudwater which extends as far as the Hammersley Lane boundary with Site. Development at the southern end of the site will mean a further joining of Loudwater to HW.</p>	<p>Agreed. High Wycombe and Loudwater already adjoin. Amend heading at 3.3.2 to state 'High Wycombe/Loudwater'.</p>
<p>207. Pg. 10 Sect. 3.2.4- Community: Section on community facilities seems to be arguing that there are sufficient facilities locally so the development will not result in an additional requirement. However this is incorrect. GV & Ashwells sit across 2 wards. Although neither of these two wards are highlighted in the current WDC Community Facilities Strategy as being a priority wards, both have a deficiency in one of the assessment categories which will increase when the new development is completed. This could be addressed either by an additional community facility on the new school site or by the construction of a new sports pavilion with community room.</p> <p>The argument that there are sufficient facilities is based on incorrect data & includes facilities which are explicitly not counted in the WDC Community Facility Strategy. The Development Brief includes public houses & religious buildings around GV & Ashwells, whereas the Community Facilities Strategy only included these categories in the strategy under exceptional circumstances.</p> <p>The religious buildings specified in the brief do not have openly available dedicated community</p>	<p>The community facilities strategy is addressed by the Reserve Sites Infrastructure Delivery Plan.</p>

facilities; so were not counted for the purposes of the Community Facility Strategy.	
--	--

Chapter 4 of the Brief	
<u>Comment</u>	<u>Response</u>
208. DFO18 is far too vague & makes reference to employment	DFO 18 ties the need to achieve a viability scheme and deliver development (including employment) into the Development Brief. These are very important factors in the overall balance of decision making. It is acknowledged that this objective is relatively vague, but to add more detail would add significantly to the overall size of the Brief. Given that housing supply is largely a district wide issue it is not appropriate to go into detail in a site specific Brief. This matter is adequately covered by the New Local Plan. Therefore, the level of detail is considered to be adequate for the purposes of the Brief. Detail is provided in other documents.
209. Overarching objectives are supported.	Acknowledged.
210. Contrary to paragraph 3.4.4 (last bullet), it has been generally agreed by all stakeholders that it is impractical & uneconomic to extend Route 31 bus service into the northern part of site. Consequent upon this is an expectation that residents of the new Ashwells development will walk via Carter Walk to the existing No.31 bus stop on Church Road. This distance is about 500 metres. Therefore can DFO 3 (and its 'boxed' repeat on pg. 40) be changed to reflect this?	Section 3.4.4 to be revised to reflect current thinking on bus options. There will be 2 bus options for the Ashwells site: No.31 and/or No.27 at the top of parcel 8. One or other of these services should be within 400 metres of the site.
211. Strongly object to the inclusion of any part of the land allocated to Parcels 8 & 9 as part of Gomm Valley development. The BMV quality arable land	The size of the gap between High Wycombe and TG turns on issues relating to: character (separate identity of places), place making, landscape impact, ecology

that these two parcels would destroy plays a major part in defining the separate character of the two settlements. Retaining this as open land would satisfy the principle aim of DFO 16, to retain the “landscape impact ecological requirements & character issues”, which the inclusion of Parcels 8 & 9 would not. This is easily visualised by taking any viewpoint looking south from the north-west corner of the Gomm Valley site, views which are equal to, if not better than, any AONB in the immediate vicinity. The undeveloped gap of 180 metres offered by the proposals is therefore completely unacceptable & should be increased to 300 metres.

(provision of a green corridor), need for housing development and development economics relating to provision of the spine road.

Given that the land is not designated as green belt there is no provision in the Development Plan for the prevention of coalescence for its own sake. It is also acknowledged that any gap smaller than what currently exists is unlikely to be palatable to local residents, albeit it is acknowledged that many residents accept some development could and should take place.

The starting point for considering the extent of development on a Reserve Site is that you develop all of it unless there is a good reason not to. During negotiations with the land owner there has been a significant cutting back of development in the north of the site to reach a position where the competing needs and constraints were considered to be in balance. The retention of an undeveloped gap of 180 metres is not considered to be insignificant in terms of separation and is comparable to the gap between a number of other areas that are considered to be separate places within the District. Indeed the gap between Cock Lane and Micklefield is 180 metres and yet these two areas have very separate identities. The gap between parcels 8 and 9 is broadly comparable with the gap maintained the length of the valley between the developer parcels and curtilages of properties in Hammersley Lane, which are also in TG Ward.

What seems to be more important than distance is the nature of the separation. Topography and vegetation appear to significantly effect the feeling of separation. TG is located on higher ground than parcel 8, which assists in creating a feeling of separation, but the change in levels is not severe and therefore this alone does not significantly enhance the feeling of separation. There is scope however to bring Kingswood across Cock Lane thereby creating a continuous woodland belt separating High Wycombe and Tylers Green. This would also aid in enhancing the ecological value of the site and screening the spine road and works to Cock Lane in longer distance views. The Development Brief should be amended to enhance the planting belt that encloses parcels 7 & 8 that take it up the western side of the site.

	<p>Having particular regard to parcel 9, this is a relatively flat area of land, which subject to the establishment of appropriate screening would have a similar impact to parcel 10 when viewed from the south.</p> <p>Critically with Gomm Valley it needs to be remembered that the valley will be fundamentally changed when construction is complete. Development will be visible from within the valley where currently it is not. The aim of the Brief is to preserve key views such as the valley shoulders, the sinuous valley form the feeling of a town set amongst the rolling hills and woodland and not developed in spite of them. In your officers view the development framework achieves this.</p>
212. DFO 2: Can only be achieved if Spine Rd stops at top of parcel 8 and Cock Lane stays single lane up to Ashwells, so no extra vehicles attracting to run thru TG.	The Development Brief appropriately balances the issues and therefore this is not accepted.
213. DFO 3: My proposals for new route for # 27 bus will help to achieve this.	The access off Cock Lane at the location proposed cannot be achieved due to land ownership issues.
214. DFO 7-10: Meeting these objectives will not be helped by any plan that creates a vehicular rat run from TG down to the A40.	The Development Brief appropriately balances the issues and therefore this is not accepted.
215. DFO 11c - More information on this (and is the Copse included?) would be helpful.	Agreed. Further information is required within the Brief on the vision for the undeveloped land. However, in the absence of an identified end provider it will not be possible to provide the fine grain detail at this time. Ultimately the Development Brief can only be as specific as it can be at the time of writing. Information relating to undeveloped land grouped within the brief and labelled more clearly
216. DFO 12: Should include "to listen to and give serious consideration to alternative proposals from the local communities".	Agreed. Amend as suggested.

<p>217. DFO 14: Strongly support this aim to "Limit traffic impact on local communities".</p>	<p>Acknowledged.</p>
<p>218. I see no likelihood that building any number of dwellings on any site near open land will enhance anything. So the objectives contained in '..... provide enhanced visual quality..... and ecological value' (DFO 5) & elsewhere in the brief are unachievable.</p>	<p>It is not accepted that the assessment can be this black and white.</p>
<p>219. DFO 14 talks about limiting the impact of the proposed development on the neighbouring communities. How is this consistent with opening Pimms Close.</p>	<p>The impact on local communities is limited by spreading the load as much as possible and facilitating alternatives to the private car.</p>
<p>220. Section 5 / Policy DFO 5(a) deals with a landscape led approach & this is supported. This policy objective will be guided by the Buckinghamshire Landscape Character Assessment. Taking a holistic view of the site constraints, this landscape led approach is of fundamental importance because the landscape character at LCA 19.1 is so linked with the wider AONB. DFO 5 (a) needs strengthening and we would add: <i>'Where visual impacts are unavoidable these shall be mitigated in a way that respects the existing landscape character although any such mitigation must be in accord with DFO5b</i> (i.e. respecting and retaining key features, green shoulders and sinuous valley form which are fundamental to the character of the valley) and to <u>DFO 5c</u>. (Avoiding the requirement for extensive manipulation of the topography).</p>	<p>Agree with sentiment. However, the way DFO5 is set out it is already required to be read as a whole. Therefore, further caveating to this end is not considered to be necessary.</p>

<p>An alternative here is a policy caveat that <u>all elements of Policy DFO 5 (a) must be satisfied in the interests of landscape character.</u></p>	
<p>221. Policy DFO 17d refers to the '<i>local Chilterns vernacular</i>' and this can be expanded to refer <u>to the Chilterns Buildings Design Guide, or reference to the historic use of materials, as is found in the brick, flint and roofing supplementary technical notes.</u></p>	<p>DFO 17d does not refer to the local Chilterns Vernacular. This has been a conscious choice to steer away from the vernacular promoted by the Chilterns Building Design Guide, particularly as the site is not within the Chilterns AONB. The Chilterns Buildings Design Guide has delivered excellent outcomes in rural village locations and on small sites in the AONB, but is unlikely to be successful in a more suburban location such as Gomm Valley and Ashwells where it is more likely to lead to a poor outcome- a pastiche of the past rather than a good quality development in its own right. It would also constrain the ability to consider more innovative house types which might have a lesser impact on both the environment, and on views of the valley and views from existing properties.</p>
<p>222. Pg. 35-36; Section 4 – We agree with the DFOs but would comment it is a pity they are not obligations.</p>	<p>Acknowledged.</p>
<p>223. Pg. 36 - 4.6 Penultimate line - should this be 2033?</p>	<p>Agreed. Change to 2033.</p>
<p>224. Note there is no DFO specifically for heritage. We suggest that a new Objective be added, that DFO 11 include archaeological benefits (buried archaeological remains should be protected by being incorporated within open spaces) & DFO 17 include archaeology.</p> <p>Development framework plan premature in absence of full archaeological information.</p>	<p>Part of the site is identified as an area of Archaeological Notificaiton. Initial investigations have indicated that there is little prospect of major archaeological finds. Therefore, at the time of preparation of the Brief the strategy is to investigate and record rather than preserve large areas of land with no development. In the event more detailed investigatory work finds important archaeological remains, then this will become a new material consideration, which may lead the Council and developer to review their position. In many respects archaeology is much like highway safety and the Council's position may need to be altered as new information comes to light, but on present evidence it does not appear to represent an absolute constraint.</p> <p>Under 4.3 add Archaeology/heritage.</p>

	<p>Between DFO 11c and 12 add 'identify, record and where necessary/appropriate preserve archaeological remains identified on the site'.</p> <p>Amend subsequent DFOs as necessary.</p>
--	---

Chapter 5 of the Brief	
Comment	Response
<p>225. First paragraph on pg. 52 regarding the circumstances for departing from perimeter blocks, it would be better to say that this is "to be encouraged" ("where principles clear definition of public & private space & good natural surveillance can be achieved") rather than the slightly negative "will only be acceptable". (Please note also that there is no such word as 'surveilled').</p>	<p>Agreed. Action change as requested, but limited to sloping sites.</p>
<p>226. Para. 5.4.1 – Solar Panels – more info. required on how these will be incorporated into the finished design so that they do not appear as an afterthought.</p>	<p>Micro renewables now fall under Building Control regulations and therefore are no longer a requirement of planning. Given that the life of this technology is likely to be far shorter than the life of the buildings to which they are attached, it is not considered that micro renewables should be designed into the buildings but rather attached.</p>
<p>227. First paragraph on pg 67, ref. is made to development that "responds to the sloping topography", but the topography of Character Area D is mostly flat & therefore Figure 5.7 would not apply.</p>	<p>Agreed, insert 'where appropriate' after 'views from these areas and'</p>
<p>228. Para. 5.4.5 (pg. 67) Could a note please be added covering the new access to Ashwells from</p>	<p>Agreed. Add annotation to Fig: 5.30 on p.70: "two lane vehicular access into site from two-lane widened Cock Lane"</p>

Cock Lane, stating whether this will be one-way or two-way & describing the impact on Cock Lane.	
229. Para. 5.4.5 (pg. 68) Walnut Close does not exist.	Agreed. Under heading 'Dwelling typologies and parking Replace 'Walnut Close' with 'Sandpits'.
230. Para.5.10.1 (pg.73) More detail is required on the range of dwelling sizes, type, & tenure to be provided for each of the development parcels, as these may be in the hands of multiple development teams & clarity over the Council's expectations on development mix will be needed to avoid manipulation of the ratio of market homes & affordable/starter homes. Further definition is also needed on broadly how the affordable homes are to be integrated. This info. will inform how the overall density is to be calculated.	Agreed up to a point. The mix will not be known until the outline stage. Add the following sentence to the final para. on page 73: "In the interests of achieving mixed communities affordable housing of all tenures should be distributed throughout the Development Brief site".
231. 5.2 - Planting / Screening: All emphasis seems to be on screening new housing from distant views, rather than from closest / those most affected (Ashwells & Carter Walk).	It is acknowledged that development adjacent to existing urban areas will in all likelihood be visible from existing urban areas. This is a normal urban relationship. There is a requirement that tree planting be incorporated into new urban development's to soften the hard form of development and the Council seek to retain existing tree cover wherever possible. However, the Council cannot commit to screening the proposed development from all existing development in its entirety.
232. 5.3.2 - Please ensure that the requirement that "existing hedgerows and trees should be retained and a minimum 5m buffer provided between them and any development" applies to the Copse at the northern edge of the Ashwells site.	The Copse will be subject to an arboriculture implications and method statement, which will indicate the appropriate distance to be applied.
233. 5.4 - Confirm that screening at the edges applies to edges abutting existing housing.	'Edges' refers to the edges of the urban area, which will be edges of the new development when completed, but as part of the overall greening of the site we will

	take all opportunities for planting, which will include street tree planting and within rear gardens.
234. Section 5.10 – this section should be clear that the supporting text to policy CS13 allows affordable housing requirements to be based on viability & reflects the potential for off-site or financial contributions in lieu of on-site provision.	There is no added value in the Development Brief repeating adopted policy.
235. Pg. 40; the paragraph beginning ‘As discussed in Section 5.10.3’ we believe this should read ‘As discussed in Section 5.10.5’ (Page 75) below should be omitted and perhaps page 75 inserted instead.	Agreed. Delete s. 5.10.3.
236. Pg. 74; 5.10.2 - Primary School - We agree the proposed location is the most suitable. We would however like to see the site & design of the school being such that it could be enlarged to 2 forms of entry should there be future need for more primary places in the Wycombe area. - End of this section – Should Fig. 5.18 read Fig. 5.19? - 5.10.3 – Children’s play facilities – Looking at the availability of play areas in the surrounding area it is essential that the development fulfils our perceived need, as we see little provision in this area. Also the busy A40 has to be crossed.	It is agreed that future proofing the school would be ideal. However, for the purposes of the Brief we can only plan for the development that it currently required. This is ultimately a matter for the education authority. Fig. numbers need to be reformatted. Local play is proposed in accordance with adopted policy.
237. Pg. 40; public transport – 4th bullet point – would read better ifroads designed to encourage slow speeds....	Agreed. Split fourth bullet point into 2 bullet points: <ul style="list-style-type: none"> • Provision of active frontages; • Road designed to encourage slow speeds, without the need for speed humps or other measures that cause particular discomfort to drivers.

<p>238. Pg. 51 – Penultimate paragraph - to avoid the creation of vertical elevations....</p>	<p>Current text fit for purpose.</p>
<p>239. Section 5.8.2 Air Quality - Levels of Nitrogen Dioxide & Particulates in the South East of England, which exceed the levels set for the UK. Proposals need to demonstrate that they do not increase the pollution from these two sources.</p>	<p>Air pollution will be considered as part of any future application. There are objective tests for determining whether air pollution has reached an unacceptable level.</p>
<p>240. Section 5.9; Proposals should favour roof/ridge orientation that maximises efficiency of solar panels, should property owners choose to install these.</p>	<p>Too specific at this stage. Roofes need to be design led, not solar panel led.</p>
<p>241. Pg. 50 – section D lumping together the areas to the north, west & east of the big hedgerow, over simplifies & blurs the particular challenges of these areas.</p>	<p>It is acknowledged that within each character area there are different issues. Need to keep the scope of the Brief manageable.</p>
<p>242. Sect. 5.1.6 "strategic" north-south cycle/foot-path should not bisect ancient hedgerow running west-east across the valley bottom as this would destroy habitats and disturb the wildlife.</p>	<p>The pedestrian and cycle route must bisect the hedgerow at some point.</p>
<p>243. Pg. 74, Sect. 5.10.3- Open Space Provision: There is an assumption made in the ‘Formal Outdoor Space’ paragraph that the outdoor sports requirement can be met off site at Terriers. However the facilities which are currently proposed for Terriers do not provide sufficient capacity for the additional needs from GV/ Ashwells. In addition there is a comment about the Ashwells/ GV sites not being suitable for open sports provision which is not true - Ashwells site in</p>	<p>Offsite sports provision is proposed at Terriers and Derehams Park.</p> <p>It is acknowledged that some sport could be provided at Ashwells, but:</p> <ol style="list-style-type: none"> 1) It would result in the loss of valuable housing land; and, 2) We could not achieve the economies of scale we need to keep long run management and maintenance costs down.

<p>particular could accommodate tennis courts/ bowls or a playing field.</p> <p>Play Areas- an additional bullet point should be added which says that the Play Areas should be located to ensure natural surveillance.</p>	
---	--

Chapter 5 of the Brief (Character Area A)	
Comment	Response
244. Detail of topography on and around the school site.	Not possible within the time available. This matter will have to be resolved in detail at the Outline and Reserve Matters stage.
245. Para.5.10.1 states 18.4 ha has been earmarked for development. Helpful to know the size of individual parcels.	Agreed. Indicate individual parcel sizes on Fig 5.1 on page 39.
246. 5.4 should provide info. on the breakdown of affordable housing provision. Daws Hill Brief contains notes in para 6.2.5 on the design & integration of affordable housing, which could be usefully incorporated.	Addition made to 5.10 about distributing affordable housing across the site.
247. Confirmed to LG that undeveloped land will remain so in perpetuity. This commitment should be confirmed in para. 5.10.4 of the Development Brief.	Agreed. Insert the following sentence in para. 5.10.4: The undeveloped land should be retained in its undeveloped form in the interests of ecology and recreation for the foreseeable future.
248. Page 57 refers to the 'appearance of development within character areas' and appears to stop abruptly. We were unsure if this section was to continue and refer to landscape character areas.	The landscape character areas are contained within section 5.3

<p>249. Priority should be given to creating a sense of arrival at this new community. The route beneath the railway bridge and up into the valley landscape could be very dramatic , framed by the school and housing at parcel 2. The contours on the housing site are also steep so this needs a considered design response. Views into and out of the site from this position are important.</p>	<p>Agreed. Brief to be amended as appropriate to highlight these issues</p>
<p>250. Proximity of residential development to the LWS and SSSI.</p>	<p>The proximity of the proposed development to these wildlife assets is acknowledged. However, having taken ecological advice it is considered that subject to adequate space being retained and appropriate boundary treatments that the proposal is acceptable in this regard. Overall the ecological mitigation package has the potential to improve the ecological value of the site.</p>

<p>Chapter 5 of the Brief (Character Area B)</p>	
<p><u>Comment</u></p>	<p><u>Response</u></p>
<p>251. Area B: No need to ruin Pimms Grove cul-de-sac to access Parcel 6. Better to create new link (Cock lane to Spine Road) above Parcel 6 & allow 6 to connect to it.</p>	<p>Access above Parcel 6 cannot be delivered because the land for vision splays is not in Aviva's ownership.</p>

<p>252. Pg. 61 & 62 confirms once again the visual impact from across the Valley. Sensitivity! Pimms Grove & Close are extremely prominent & will dominate the visual impact over the whole of the valley. Styles of the houses proposed are of a harsh modern nature totally out of character to the outstanding landscape of the unique Gomm Valley. Have attached photos (PH2) of Wye Dene development which in our opinion portrays a softer more harmonious sympathetic impact & would be more acceptable to the local residents.</p>	<p>The photographs shown on p.62 are illustrative only and do not definitively indicate the final form of the development, however building heights and roof forms will be a key determinant of the overall impact this proposal has on views. It is recognised that more contemporary architecture is not universally appreciated however recommendations within the brief are given with the aim to minimise bulky pitched roofs where this is considered to have a deleterious impact on views both of the valley, and from existing properties. The architecture of Wye Dene, with its three-storey buildings topped with gabled roofs, would have a detrimental impact on views if used in more steeply sloping areas within Gomm Valley.</p>
<p>253. Pg. 61 - Dwelling typologies and parking – 1st paragraph, last sentence it will likely be necessary to include a significant proportion</p> <p>254. 4th paragraph, 1st sentence in accordance with Buckinghamshire County Council</p>	<p>Agreed.</p> <p>Insert 'to' after necessary.</p> <p>Agreed.</p> <p>Replace 'Buckingham' with 'Buckinghamshire'.</p>
<p>255. Pg. 63 Fig. 5.23 Instead of funnelling parcel 6 traffic through Pimms Grove; access this site from a new access from the north.</p>	<p>This option may be pursued. The Pimms Close access will only be used by vehicular traffic if required for the purposes of a bus.</p>

<p>Chapter 5 of the Brief (Character Area C)</p>	
<p><u>Comment</u></p>	<p><u>Response</u></p>
<p>256. (P.65) includes a photo of TG.</p>	<p>P.65 contains a photo of a gravel road and path that just happens to be in TG. The point being made is that this could comprise an acceptable form of surfacing. This form of road surfacing is not exclusive to TG.</p>

<p>257. Pg. 64 – Dwelling typologies & parking - 1st paragraph – WE think ares should read area.</p> <p>3th paragraph - Buckinghamshire County Council</p>	<p>Agreed. Replace 'ares' with 'area'.</p> <p>Replace 'Buckingham' with 'Buckinghamshire'.</p>
---	--

Chapter 5 of the Brief (Character Area D)	
<u>Comment</u>	<u>Response</u>
<p>258. Exposed properties in parcel 9 require an exceptional architectural response.</p>	<p>Agreed. On page 69 include a separate heading setting out the need for an exceptional architectural response on parcel 9. Also add an annotation to the plan on page 70.</p>
<p>259. 5.4.4 - Area C: Densities: Suggested density of up to 25 DPH but falling lower at top edges as settlement edge location should also apply to Ashwells (so less than 25).</p>	<p>Given the contained nature of Ashwell's, this is not considered to be necessary. The planting around character area C will take many years to mature whereas area D benefits from existing planting which will help to screen the development.</p>
<p>260. Density on Ashwell's site should be much the same as its neighbours. (Wheeler Av/Carter Wk: 15dph; Ashwells: 19dph; Sandpits Lane 5dp</p>	<p>Density on adjoining land is a consideration, but not an overriding one. Planning policies are not constructed so as to require densities of new developments to be so limited that they can only match that of adjoining development.</p>
<p>261. Do not welcome houses of 2.5 storeys, which would be untypical of neighbouring dwellings.</p>	<p>There are two storey dwellings within the TG area with converted loft spaces. This is commonly referred to as 2.5 storeys and not considered to be out of character. Some 2.5 storey development at Ashwells would similarly not be out of character. Slightly different does not automatically equate to out of character. There can quite properly be a lot of variation within a single character area, as is evident in the existing development at Tylers Green.</p>

<p>262. More detail required on the range of dwelling sizes, type and tenure on each of the development parcels.</p>	<p>Type and size of dwellings is not yet known. On the issue of tenure the starting point is that 40% of bedspaces will be in affordable dwellings (66% for rent and 34% shared ownership). Under current policy the Council does not seek starter homes. This matter is covered in depth in the Brief as it is covered by adopted policy. If developers wish to depart from this they will need to provide special justification.</p>
<p>263. Parcel 9 is where the vast majority of archaeological finds have been made; so will require particular investigation prior to building.</p>	<p>Acknowledged. This will be required as part of any planning assessment.</p>
<p>264. Allotments may not be needed. Allotments off Ashley Drive are under subscribed.</p>	<p>Accepted.</p>
<p>265. There should be a note that this area should be dark with no street lights.</p>	<p>Agreed. Add to section 5.4.5: TG is an area without street lighting. The proposed development should conform with the characteristic.</p>
<p>266. It is understood that there will be no business use at Ashwells.</p>	<p>This is correct. The only area allocated for business is at the southern end of the site.</p>
<p>267. Cycle Routes (Pg. 43) will require considerable work/cost. We are strongly supportive of them. Responsibility for cost/implementation should be clearly defined.</p>	<p>This matter is addressed in the Wycombe Reserve Sites Infrastructure Delivery Plan. Developers will be required to meet the costs of all works identified in the site packages.</p>
<p>268. Would like road names to reflect historic field and place names. Would like an opportunity to contribute towards them.</p>	<p>This is not a planning matter. Will enquire separately whether this is possible.</p>
<p>269. General public do not know what legible residential streets means.</p>	<p>Legible means clearly defined fronts and backs and a clear street hierarchy. This is a common urban design term. Given that this document is principally aimed at professional developers the term is considered to be acceptable.</p>

<p>270. Parcel 9 does not fit comfortably within the overall Development Brief. This parcel should not be included in the Development Brief & instead brought forward as part of a separate application.</p>	<p>The purpose of the Development Brief is to ensure a comprehensive development of the site. No parcels of land should be bought forward as separate applications.</p>
<p>271. The copse is & should remain an important area for the protection & preservation of local wildlife. The copse needs to be protected. Local residents have expressed an interest in looking after this area if arrangements can be agreed & implemented.</p>	<p>The Council is committed to retaining the copse. Management of the copse will be dependent on its end use, which at the present time is unknown.</p>
<p>272. Bottom two images on pg. 57 do not correspond with the text above & are unconvincing dwelling typologies.</p>	<p>One of the pictures shows a green roof. The other shows large timber balconies with glass balustrades. Green roofs and contemporary architectural construction methods are mentioned in the preceding text and therefore the pictures are considered to be appropriate. The pictures indicate an architectural approach rather than a preferred end design.</p>
<p>273. Section 5.4.5 - Para 4: Can't extend gardens of existing houses into new site as the pumped sewer & its 6m exclusion zone runs along the edge of the Ashwells site, abutting the bottom of the existing back gardens.</p>	<p>Infrastructure can be relocated or mitigation provided. This is not considered to represent an absolute constraint.</p>
<p>274. Para 7 (proximity to P&TG): These characteristics (variation of plot sizes, shapes and boundaries, gravel road surfaces, etc.) relate only to the small P&TG Conservation Area. Area D's housing should reflect section 3.3.1's requirement to be appropriate to "the immediate context (characterised by modern, detached dwellings)" & noting that these are mainly 3 to 5 bed executive properties.</p>	<p>P&TG Conservation Area has some attractive features, which are worth borrowing from when informing the new development. These features could work with either a traditional or contemporary design approach.</p>
<p>275. Densities: It is Wheeler (no 's') Ave, not Wheelers.</p>	<p>Acknowledged.</p>

<p>276. Fig 5.28 - Pictures should be changed to reflect type of housing in the immediate context.</p>	<p>Not accepted. The photographs provide an indication of where we want to go. There is no intention to replicate the existing development in Wheelers Avenue.</p>
<p>277. Fig. 5.30 - I note the existing woodland (the Copse) is to be maintained. It should not be included in the gardens of new houses (as has been suggested) or included in the area used for housing density calculations (as already tried by WDC in contravention of government guidelines on how housing density should be calculated) as it was created to be & is a “significant landscape buffer strip”.</p>	<p>The Development Brief proposes to retain the copse. Its future use and whether or not it is publically accessible is a matter that will be determined as part of the layout.</p>
<p>278. Electricity: 11.5kV cable runs across Parcel 11.</p>	<p>Infrastructure can be relocated or mitigation provided. This is not considered to represent an absolute constraint.</p>
<p>279. Section 5.10.2 - New Primary School: Catchment area should not include Terriers Farm (too far away), nor Ashwells (in the TG schools catchment area) as it would pull extra traffic flows into & through TG.</p>	<p>Catchment areas is a matter for the County Education Authority. It is not and never has been the intention that children from Terriers would attend the school at Gomm Valley. The additional school would merely increase the number of school places proportionate to the expected increase in the number of children. Once the new school is built catchment areas will need to be adjusted accordingly.</p>
<p>280. 5.10.4 - Undeveloped Land. The Copse should be included in this as it already provides a link between local sites & has visits from deer (muntjac & roe deer), badgers, foxes etc. & is used by several not so common birds, including Jays, Woodpeckers, etc & is home to a resident male pheasant.</p>	<p>The future of the copse and its maintenance will be determined once its end use is known.</p>
<p>281. Section 5.1.1 – bullet point 5 states that access from Cock Lane should be immediately south of the pumping station. This is proving problematic due to sightlines & the fact that pumping station is in third party ownership. Therefore, bullet point 5 should be</p>	<p>Agreed. Amend bullet point 5 to include: “as close to the pumping station as possible given junction design requirements”</p>

<p>changed to read 'as close to the pumping station as possible given junction design requirements'.</p>	
<p>282. Section 5.3.2 – requires a minimum 5 metre buffer between existing hedgerows, trees & new development. This is an arbitrary requirement & should be replaced with a requirement indicating how trees & hedges should be protected.</p>	<p>This is considered to represent a good starting point for ensuring conflict does not arise between the preservation of key vegetation and development. In the event that there are good reasons why this cannot be achieved this can be put forward as part of the application.</p>
<p>283. Draft policy DM33, which requires 25% tree coverage is not viable.</p>	<p>It is open for any applicant to submit a viability assessment in the event Council policy is considered to be unviable on a site specific case.</p>
<p>284. Pg.68; suggests densities of around 25dph in character area D. It is important that numerical density requirements do not stifle the opportunity for good urban design or force inappropriate design solutions. Welcome clarity on how density is to be calculated.</p>	<p>A requirement of 'around' 25dph allows design flexibility that should not stifle good urban design.</p>
<p>285. The upper section of CWY/14/1 from Ashwells to Carter Walk should be all-weather or paved/tarmacked so that all residents can walk directly to TG.</p>	<p>Agreed. It will be path within an urban development and therefore should have urban characteristics.</p>
<p>286. Object to the inclusion of parcel 11:</p> <ul style="list-style-type: none"> a) Land at Parcel 11 is higher than Ashwells & Green Ridge. As such, development will lead to overlooking. b) There is no vegetation buffer/tree line to screen new development. Request structural planting buffer, similar to Parcel 9. c) Need a graphic setting out how the levels issues will be dealt with between Parcel 11 & Ashwells. 	<p>Parcel 11 is necessary to deliver the alternative access to Ashwells. Additional information is required on the design requirements for this parcel. Already provided.</p>

<p>d) Parcel 11 is identified as being within a zone of wider visibility & therefore should not be built on.</p>	
<p>287. You do not deliver on any part of DFO 14 if you are a resident of Ashwells & Greenridge.</p>	<p>The objective is to limit the impact of overlooking and privacy through distance and screening. A degree of visibility between properties in any urban area is a feature of urban development. The Council cannot deliver absolute privacy or eliminate the development from public/private view.</p>
<p>288. Area D described as sloping gently on its western half. This slope is not gentle & as such provides challenges for vehicular access, privacy & views.</p>	<p>It is gentle relative to other slopes in GV. The need for a more detailed design specification for the properties in Ashwells/Greenridge is acknowledged.</p>
<p>289. Object to any diversion to footpath CWY/14/1. This footpath has been in place for decades & does not present a problem to existing residents.</p>	<p>The primary purpose of relocating the footpath is to provide a good quality walking environment for future users of the footpath; one that is not flanked on both sides by close board fencing.</p>
<p>290. Character area D needs more detail:</p> <ul style="list-style-type: none"> a. Detail on the character, form & type of housing development. Preference for detached housing adjacent to existing detached housing. b. Details on landscaped screening/buffering. c. Separation between new housing & existing housing in Ashwells. 	<p>The Development Brief should not be too prescriptive at this stage.</p> <p>Amend Brief to provide further detail on the relationship between proposed dwellings and those in Ashwells. Text already provided.</p>
<p>291. The initial studies on infrastructure etc. were done before the addition of Parcel 11 - they obviously need to be revisited.</p>	<p>Infrastructure contributions will be revisited once final dwelling numbers are known.</p>
<p>292. I note there may also be an opportunity to extend some of (our) gardens into the new site. What does this mean and will we have a choice?</p>	<p>This means that some land within the Development Brief site may be made available for garden extensions to existing properties. The terms of any transfer of land will be a matter for the developer. Whether or not a particular owner</p>

	wishes to accept those terms will be matter for that owner. No one can make you extend your garden.
293. Pedestrian access to the village; with over 100 new houses, there is a strong argument for a permanent & adequately surfaced footpath from the site, through Carter Walk & Wheeler Ave. to the village – one that can accommodate pushchairs & pedestrians (but not motor cycles) & doesn't involve battling through brambles, nettles and mud. This will enable families to walk safely to and from the local schools, and to the facilities of the village.	Agreed. This is picked up in the Reserve Sites Infrastructure Package. Footpaths between the site and village will be expected to be delivered to an all-weather urban standard.
294. Parcel 11; we understood that the field that shows the location of Parcel 11 sits within a zone of visibility (shown on page 32). For this reason we are opposed to any development on this land.	Parcel 11 is in a visible location. This part of the Ashwells site is visible from Totteridge/Micklefield and in much longer distance views. All public views of the west side of Ashwells are set against a foreground of urban development. Urban to urban views are not considered to be as sensitive as rural to urban views. The key importance of the western side of Ashwells is the views out rather than the views in. It was considered that the benefit arising from creating an additional access into Ashwells outweighed the landscape impact.
295. Fig. 5.22 / Pg. 69 on design typologies make references to character precedents, including the AONB, and also refers to 'semi-rural Chilterns Character' (page 69). We recommend a design coding approach here, with brief explanation of the historic context and relationship of High Wycombe with the wider Chilterns. It may be the case that the settlement types shown in the Chilterns Buildings Design Guide and details in the technical notes will assist, together with reference to the landscape character assessment. The illustrations shown are not all drawn from Buckinghamshire or do not illustrate the design code treatment that you seek.	The preparation of a design code at this stage is considered to go beyond the scope of the Development Brief. The Chilterns Buildings Design Guide is not being applied to this site as it is not within the Chilterns.

<p>This section may, therefore, benefit from some editing.</p>	
<p>296. Pg. 69 – 2nd paragraph - Buckinghamshire County Council - end 3rd paragraph - such provision is best made on street.</p>	<p>Agreed. Change as suggested.</p>
<p>297. P.69 - there should be a mix of housing in Ashwells. Section is quite vague.</p>	<p>Additional clarity to be added [i.e. could comprise, flats, house (detached, semi-detached and terraced)].</p>
<p>298. Ashwells is residential on both sides & thus unsuitable for widening. I suggest any access from Ashwells into Character Area D should retain the current cul-de-sac nature of Ashwells, rather than being a general access for the whole of Character Area D.</p>	<p>The relationship of Ashwells to the site will be determined at the reserved matters stage when layout is agreed.</p>
<p>299. Pg. 67 Sect. 5.4.5 Informal gravel surface streets; difficult to keep tidy from leaves from trees & difficult to clear of snow.</p>	<p>It is anticipated that primary routes would have a blacktop finish.</p>
<p>300. Pg. 68 Fig 5.28 - Photos are misleading; bear no resemblance to houses in immediate vicinity, either to the West, North or East.</p>	<p>The aim is not to replicate existing development. The aim is to create a new place with a distinct character, but which respects the character on the existing development. This is in much the same way that Ashwells, Wheeler Avenue and Sandpits are different in respect of density, form and appearance but respect one another's character.</p>
<p>301. Pg. 69, Concerned that under appearance, it states: 'neutral colour palette is less important'. This is a rural site & multicoloured lego-block style of housing or cladding will not be appropriate. Do not</p>	<p>Multicoloured lego blocks are not being proposed.</p>

want coloured render of Wycombe Marsh nor coloured bricks of Pine Trees at Daws Hill. Please keep to brick, stone, timber & neutral renders.	
302. Pg. 69 – relatively level topography not accurate for all area D.	The description of the land in character area A is considered to be accurate. The land does begin to plateau and the western half does begin to slope down. There are localised anomalies to this.

Other Matters (flooding, Archaeology)	
<u>Comment</u>	<u>Response</u>
303. Proposed development is at odds with the Council's own sustainability appraisal. It only achieves a 'very positive' result in two categories: 1) population & housing and 2) education, skills & training. Scores very negative in respect of: 1) Best use of land including soil; 2) Transport & 3) Place-making	The site has been released for development. The Development Brief does not consider the principle of development.
304. More detail required in respect of checks & procedures relating to archaeology.	Agreed. Detailed reports will be required at the application stage.
305. Site is very steep sided & flooding will be a concern with concreting over the greenfield site. In winter as we see with all other hillside sites snow effectively means these housing estates become a no go zone & ice an additional hazard.	The site will be required to achieve green field run off rates and therefore a full sustainable urban drainage package will be required. Given the hills in the Wycombe area it is acknowledged that the Town is disproportionately affected by snow and ice. This is feature of the town.

306. P.72 - include sewage pumping station, but omit the pumping main. Drainage is a different section.	Make change Plan accurately showing all infrastructure has been requested from Savills.
307. Significant loss of community feel for TG; which has not been considered.	Efforts are being made to integrate the new development into TG. Future residents may quite properly contribute to the community feel of TG.

General	
<u>Comment</u>	<u>Response</u>
308. General comment on document itself. It contains a plethora of fine Objectives, but I cannot find a section that describes what processes and measures will be put in place to ensure these Objectives are met. I believe many of these are actually subjective. Some use of 'SMART' (Specific, Measureable, Assignable, Realistic and Time-related) criteria should be added in the final version for this purpose, otherwise the Objectives are meaningless.	<p>Section 4 of the Brief sets out the objectives. Section 5 of the Brief sets out how the objectives will be delivered. There is a limit to the level of detail that section 5 can go into at this stage. The detail of the delivery mechanisms will be set out at the planning stage through conditions. Conditions in order to be valid must be:</p> <ol style="list-style-type: none"> 1. necessary; 2. relevant to planning and; 3. to the development to be permitted; 4. enforceable; 5. precise and; 6. reasonable in all other respects <p>Therefore they must in effect deliver against the SMART objectives.</p>
309. Parcel 11: <ul style="list-style-type: none"> o Is the footpath along the back of our gardens going to be reinstated? o Has anyone considered the bat population in the area? 	<p>Detailed ecology assessments will be required as part of any application. Detailed layout matters are not yet known. Working hours are nationally enforced by the Health and Safety Executive. It is not envisaged that there will be a case for compensation. Affordable housing is required on the site. There will be new facilities on and off site for residents.</p>

<ul style="list-style-type: none"> ○ How far away from the end of our property will buildings be? ○ Will houses have windows looking into our gardens? ○ Building should only be allowed after 9 am and finish by 5pm. ○ No building at weekends. ○ Compensation? ○ Will there be housing that is affordable for our kids - semis/terraced? ○ Will there be new facilities for residents? <p>KJ & AM - We already have terrible problems with drains - will these be replaced/improved - they certainly can't support more houses in their current state - raw sewage leaking up through drains last month!</p>	<p>Thames Water will be consulted on any future application to address general capacity issues. Building Control will deal with site specific issues. In all events it will be necessary to provide adequate foul drainage that does not impact on existing residents.</p>
<p>310. Official route of the footpath from Carter Walk into the fields was blocked for some time at the field end by nettles etc. The Council refused to clear it as "it was not on the plan for this year" will the path be kept clear after the development?</p>	<p>This part of the path will be urbanised and therefore it is envisaged that nettles will be less of a problem.</p>
<p>311. It is acknowledged that the Council is trying to treat the site as 1, but it should be acknowledged that the circumstances for the development of Ashwell's are different from the rest of GV.</p>	<p>All land owners and sites are treated the same. There is no special treatment for Council owned land.</p>
<p>312. Ownerships of KMP (Harrow) Ltd and the Bew/Dugan family have not been identified or brought to the attention of the Liaison Group.</p>	<p>Land ownership has been discussed at Liaison Group meetings on a number of occasions. The Bew/Dugan family have expressly requested not to be involved. Thames Water were approached at the start of the process, but expressed no interest in being involved. When Thames Water sold the land to KMP (Harrow) Ltd, they have not approached the Council and by this time there was no ambition on the Council's side to develop the KMP (Harrow) Ltd land and therefore they</p>

	were not approached. It has been open to KMP (Harrow) Ltd to approach the Council at any time.
313. Council's need to provide Cycle Lanes; not only in the towns, but between them - that includes on roads that go between different councils.	Agreed. The Infrastructure package for the sites contains a cycle strategy. The Reserve Site are required to make provision for cycling onsite and contribute to off-site provision. The cycle strategy for the town cannot be delivered in its entirety by the reserve sites.
314. Developers held exhibition for residents on 22/23 July 16 with one day notice. Other residents received no notice. These days were when school year ended & people would be on holiday.	This is a matter beyond the Council's control. It is the Council's understanding that several weeks notice was given.
315. WDC has not answered this question. Where are the tonnes of barley produced every year going to come from? By using more of the land it makes the question more relevant. When you use agricultural land do WDC not have to justify where the crop is going to be grown in the future?	Produce is grown globally and farmers grow different crops every year depending on supply and demand. It would be impossible for WDC or any other organisation to provide absolute clarity on this matter.
316. Two years ago I read in village voice that WDC had discovered 12,000 people living in Wycombe that they were unaware of & that more housing was required as a result.	The population of Wycombe District did rise over the last decade as did the population of the country. New housing is required to accommodate this rise in population it is also required due to increasing household formation with more single people living alone in all age groups.
317. Self build; would be encouraging to know a good portion of plots are set aside for this activity, rather than just allowing identikit builds by a developer - Hope this is accounted for in overall plan. If there are any plots allocated for self build, favouring locals might decrease resistance to development. Self build would also increase build diversity & increase work for small local building companies. Whilst large developers will create good jobs, only small local building companies will keep the majority of the money in our local economy.	There is no dispute that self build development brings with it certain benefits. The Brief does not seek at this stage to be so specific as to set out a requirement for self building plots. This is a matter for planning policy. However, there would be no residence in principle to the provision of selfbuild plots on the site.

